

1 BENJAMIN B. WAGNER  
 United States Attorney  
 2 DONNA L. CALVERT  
 Regional Chief Counsel, Region IX  
 3 Social Security Administration  
 ELLINOR CODER, CSBN 258258  
 4 Special Assistant United States Attorney  
 5 160 Spear Street, Suite 800  
 San Francisco, California 94105  
 6 Telephone: (415) 977-8955  
 7 Facsimile: (415) 744-0134  
 E-Mail: Ellinor.Coder@ssa.gov  
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9 Attorneys for Defendant

10 **UNITED STATES DISTRICT COURT**  
 11 **EASTERN DISTRICT OF CALIFORNIA**  
 12 **SACRAMENTO DIVISION**

13	FREDERICK TATUM,	)	Case No.: 2:14-CV-01622-CMK
14		)	
15	Plaintiff,	)	STIPULATION AND PROPOSED ORDER
		)	FOR AN EXTENSION OF TIME
16	vs.	)	
17	CAROLYN W. COLVIN,	)	
	Acting Commissioner of Social Security,	)	
18	Defendant.	)	

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20 IT IS HEREBY STIPULATED, by and between the parties, through their respective  
 21 counsel of record, that the time for Defendant’s Opposition to Plaintiff’s Motion for Summary  
 22 Judgment be extended from **June 19, 2015** to **July 20, 2015**. The parties further stipulate that  
 23 the Court’s Scheduling Order shall be modified accordingly. This is Defendant’s first request for  
 24 an extension of time to respond to Plaintiff’s motion. Defendant respectfully requests this  
 25 additional time because of the heavy workload of counsel responsible for briefing this case. For  
 26 example, counsel for Defendant is responsible for briefing a case before the Ninth Circuit this  
 27 month and has dozens of active District Court cases in a variety of stages.  
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1 Counsel apologizes to the Court for any inconvenience caused by this delay.

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3 Respectfully submitted,

4 Dated: June 15, 2015

/s/ Peter E. Brixie  
(As authorized via email on 6/15/2015)  
PETER E. BRIXIE  
Attorney for Plaintiff

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7  
8 Dated: June 15, 2015

BENJAMIN B. WAGNER  
United States Attorney  
DONNA L. CALVERT  
Regional Chief Counsel, Region IX  
Social Security Administration

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11  
12 By /s/ Ellinor Coder  
ELLINOR CODER  
Special Assistant U.S. Attorney  
Attorneys for Defendant

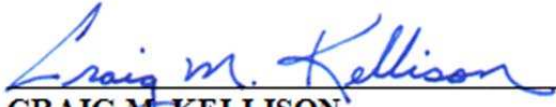
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14  
15 OF COUNSEL FOR DEFENDANT

16 AMANDA SCHAPPEL  
Assistant Regional Counsel

17  
18 ORDER

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20 APPROVED AND SO ORDERED:

21  
22 Dated: June 18, 2015

  
CRAIG M. KELLISON  
UNITED STATES MAGISTRATE JUDGE