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

12 TAMMY J. WILCOX,) No. 2:14-cv-01636-DAD
13)
Plaintiff,) STIPULATION AND ORDER FOR A FIRST
14) EXTENSION OF 30 DAYS FOR
vs.) DEFENDANT TO RESPOND TO
15) PLAINTIFF'S MOTION FOR SUMMARY
16) JUDGMENT AND FILE HER CROSS-
Acting Commissioner of Social Security,) MOTION FOR SUMMARY JUDGMENT
17)
18 Defendant.)
19)

20 IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record,
21 that Defendant shall have a first extension of time of 30 days to respond to Plaintiff's Motion for
22 Summary Judgment and file her Cross-Motion for Summary Judgment. This extension is
23 requested due to Defendant's counsel's exceptionally heavy workload at this time, including five
24 District Court briefings due and an oral argument scheduled in the next two weeks. Defendant's
25 counsel also has multiple pre-hearing filings due to the Merit Systems Protection Board on April
26 24, 2015 and May 8, 2015 regarding an employment law matter in litigation. The additional
27
28

1 time requested is needed to adequately research the issues Plaintiff has presented. The current
2 due date is April 27, 2015. The new due date will be May 27, 2015.

3 The parties further stipulate that the Court's Scheduling Order shall be modified
4 accordingly.
5

6 Respectfully submitted,

7
8 Dated: April 23, 2015

/s/ *Marc v. Kalagian
9 (*as authorized by email on Apr. 23, 2015)
10 MARC V. KALAGIAN
11 LAW OFFICES OF ROHLFING & KALAGIAN, LLP
12 Attorney for Plaintiff

13 Dated: April 23, 2015

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

18 By: /s/ Jennifer A. Kenney
19 JENNIFER A. KENNEY
20 Special Assistant U.S. Attorney
21 Attorneys for Defendant

22 **ORDER**

23 Pursuant to the parties' stipulation, IT IS SO ORDERED.

24 Dated: April 27, 2015

25 
26 _____
27 DALE A. DROZD
28 UNITED STATES MAGISTRATE JUDGE

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