

1 BENJAMIN B. WAGNER  
 United States Attorney  
 2 DONNA L. CALVERT  
 Illinois State Bar No. 6191786  
 3 Regional Chief Counsel, Region IX  
 Social Security Administration  
 4 SHARON LAHEY  
 California State Bar No. 263027  
 5 Special Assistant United States Attorney  
 6 160 Spear Street, Suite 800  
 7 San Francisco, California 94105  
 Telephone: (415) 977-8963  
 8 Facsimile: (415) 744-0134  
 9 E-Mail: Sharon.Lahey@ssa.com

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

13	NAEN PHACHANH,	)	CIVIL NO. 2:14-CV-01805-AC
14	Plaintiff,	)	<b>STIPULATION AND PROPOSED ORDER FOR A FIRST EXTENSION OF 30 DAYS FOR DEFENDANT TO RESPOND TO PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT</b>
15	vs.	)	
16	CAROLYN W. COLVIN,	)	
17	Acting Commissioner of Social Security,	)	
18	Defendant.	)	

19  
 20 IT IS HEREBY STIPULATED, by and between Naen Phachanh (Plaintiff) and  
 21 Defendant Commissioner of Social Security Carolyn W. Colvin (Defendant), by and through  
 22 their respective counsel of record, that Defendant shall have a first extension of time of thirty  
 23 days to respond to Plaintiff's motion for summary judgment and/or to file any cross-motions  
 24 thereto. The current deadline is January 26, 2015. The new deadline will be February 25, 2015.  
 25 Defense counsel requests this extension of time due to an especially heavy caseload in January  
 26 and February 2015, including twelve district-court dispositive motions as well as two motions  
 27 and one oral argument before the Ninth Circuit. As a result, defense counsel requires more time  
 28 to adequately address the issues that Plaintiff raises in his joint stipulation. The parties have

1 further agreed that, with the Court's approval, the case management order be modified  
2 accordingly.

3 Date: January 26, 2015

LAW OFFICES OF JOHN V. JOHNSON

4 By: /s/ John V. Johnson

5 JOHN V. JOHNSON

6 Attorneys for the Plaintiff

(As authorized by e-mail on January 26, 2015)

7 Date: January 26, 2015

BENJAMIN B. WAGNER

8 United States Attorney

9 By: /s/ Sharon Lahey

10 SHARON LAHEY

11 Special Assistant United States Attorney

Attorneys for Defendant

12  
13 **ORDER**

14 GOOD CAUSE APPEARING, PURSUANT TO STIPULATION, IT IS SO ORDERED.  
15 DEFENDANT SHALL FILE HER RESPONSE TO PLAINTIFF'S MOTION FOR SUMMARY  
16 JUDGMENT ON OR BEFORE FEBRUARY 25, 2015. ANY REPLY THERETO SHALL BE  
FILED ON OR BEFORE MARCH 17, 2015.

17 DATE: January 26, 2015

18 

19 ALLISON CLAIRE

20 UNITED STATES MAGISTRATE JUDGE