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

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

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 second 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 February 25, 2015. The new deadline will be March 27, 2015.
 25 This is the second extension of time requested by Defendant. Defense counsel requests this
 26 extension of time due to an especially heavy caseload in February 2015, including fourteen
 27 district-court briefs as well as two briefs and one oral argument before the Ninth Circuit. As a
 28 result, defense counsel requires more time to adequately address the issues that Plaintiff raises in

1 his motion for summary judgment.

2 The parties have further agreed that, with the Court's approval, the case management
3 order be modified accordingly.

4 Date: February 24, 2015

LAW OFFICES OF JOHN V. JOHNSON

5 By: /s/ John V. Johnson
6 JOHN V. JOHNSON
7 Attorneys for the Plaintiff
(As authorized by e-mail on February 24, 2015)

8 Date: February 24, 2015


BENJAMIN B. WAGNER
9 United States Attorney

10 By: /s/ Sharon Lahey
11 SHARON LAHEY
12 Special Assistant United States Attorney
Attorneys for Defendant

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14 **ORDER**

15 Good cause appearing, pursuant to stipulation, it is so ordered. Defendant shall file her
16 response to plaintiff's motion for summary judgment on or before March 26, 2015. Any reply
17 thereto shall be filed on or before April 16, 2015.

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19 DATE: February 24, 2015

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21 ALLISON CLAIRE
22 UNITED STATES MAGISTRATE JUDGE
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