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11 Attorneys for Defendant

12 UNITED STATES DISTRICT COURT  
 13 EASTERN DISTRICT OF CALIFORNIA

14  
 15 KEVIN CALKINS, ) No. 14-cv-01877-AC  
 )  
 16 Plaintiff, ) STIPULATION TO EXTEND  
 ) BRIEFING SCHEDULE  
 17 v. )  
 18 )  
 19 CAROLYN W. COLVIN, )  
 Acting Commissioner of Social )  
 20 Security, )  
 21 )  
 22 Defendant. )  
 23 )

24 The parties stipulate and agree, subject to the Court’s approval, that the time for  
 25 Defendant to serve her response to Plaintiff’s Motion for Summary Judgment is extended  
 26 from March 20, 2015 to April 20, 2014. All other dates in the Court’s Scheduling Order  
 27 are extended accordingly. Defendant needs the extension because of counsel’s heavy  
 28

1 caseload and press of work. Counsel had seven district court briefs and five district court  
2 responses and/or answers due this month, in addition to handling numerous Bankruptcy  
3 Court cases. Because of counsel's busy schedule, counsel was unable to complete a  
4 defensibility review and draft a timely response. Defendant apologizes for any  
5 inconvenience caused by this delay and asks the Court to grant the extension request.  
6 Defendant requests this extension in good faith, with no intent to prolong  
7 proceedings unduly. Plaintiff's counsel has agreed to stipulate to the extension.  
8

9 Dated: MARCH 22, 2015

*/s/ Jesse Kaplan*  
(email authorization)  
JESSE KAPLAN  
Attorney for Plaintiff

13 Dated: MARCH 22, 2015


BENJAMIN B. WAGNER  
United States Attorney  
THEOPHOUS H. REAGANS

16 By: */s/ Theophous H. Reagans*  
17 THEOPHOUS H. REAGANS  
18 Special Assistant United States Attorney  
19 Attorneys for Defendant

20 **ORDER**

22 APPROVED AND SO ORDERED.

25 DATED: March 23, 2015

  
ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE