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Attorney for Plaintiff

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

TUNI DEE HERNANDEZ,)
)
Plaintiff,)
)
v.)
)
CAROLYN W. COLVIN,)
Acting Comm'r of Social Security,)
)
Defendant,)
)
_____)

Case No. 2:14-cv-02142-CKD

**STIPULATION AND PROPOSED
ORDER FOR EXTENSION OF TIME
TO FILE OPENING BRIEF**

IT IS HEREBY STIPULATED by the parties, through their undersigned attorneys, to extend the time 14 days to March 5, 2015, for filing of Plaintiff's Motion for Summary Judgment, in accordance with the Court's Scheduling Order. This is Plaintiff's first request for an extension. This extension is requested because Plaintiff's counsel is experiencing a backlog in her workload that she is in the process of resolving.

**Hernandez v. Colvin
E.D. Cal. 2:14-cv-02142-CKD**

Stipulation and Proposed Order

The parties further stipulate that the Court's Scheduling Order be modified accordingly.

Respectfully submitted,

Date: February 16, 2015

JACQUELINE A. FORSLUND
Attorney at Law

/s/Jacqueline A. Forslund
JACQUELINE A. FORSLUND

Attorney for Plaintiff

Date: February 18, 2015

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

/s/ Francesco Paulo Benavides
FRANCESCO PAULO BENAVIDES
Special Assistant United States Attorney
*By email authorization

Attorney for Defendant

ORDER

APPROVED AND SO ORDERED

Dated: February 19, 2015



CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE

Hernandez v. Colvin
E.D. Cal. 2:14-cv-02142-CKD

Stipulation and Proposed Order