

1 BENJAMIN B. WAGNER
 United States Attorney
 2 DONNA L. CALVERT
 Regional Chief Counsel, Region IX
 Social Security Administration
 4 JEFFREY CHEN, CSBN 260516
 Special Assistant United States Attorney
 5 Social Security Administration
 333 Market St., Suite 1500
 6 San Francisco, CA 94105
 Telephone: (415) 977-8939
 7 Facsimile: (415) 744-0134
 8 Email: Jeffrey.Chen@ssa.gov
 9 Attorneys for Defendant

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

14 ERIC PAUL NEUMANN,)	Civil No. 2:14-cv-02190-KJM-CMK
)	
15 Plaintiff,)	STIPULATION AND ORDER FOR A
)	FIRST EXTENSION OF TIME FOR
16 v.)	DEFENDANT TO FILE HER MOTION
)	FOR SUMMARY JUDGMENT
17 CAROLYN W. COLVIN,)	
18 Acting Commissioner of Social Security,)	
)	
19 Defendant.)	
20 _____)	

21 IT IS HEREBY STIPULATED by the parties, through their undersigned attorneys, and
 22 with the approval of the Court, that Defendant shall have a first extension of time of 30 days to
 23 file her motion for summary judgment. Defendant respectfully requests this additional time
 24 because he will be out on vacation in Taiwan from February 26 through March 14, and has a
 25 very heavy workload despite due diligence in maintaining his calendar.

26
 27
 28 Stip. to Extend Def.'s MSJ

1 The new due date for Defendant's motion for summary judgment will be Friday, March
2 27, 2015.

3
4
5 Date: February 25, 2015

Respectfully submitted,

LIPTON & LIPTON

6
7
8
9 Date: February 25, 2015

By: /s/ Mark Hanley Lipton*
MARK HANLEY LIPTON
* By email authorization on Feb. 25, 2015
Attorney for Plaintiff

10
11
12
13

BENJAMIN B. WAGNER
United States Attorney

By: /s/ Jeffrey Chen
JEFFREY CHEN
Special Assistant United States Attorney
Attorneys for Defendant

14
15
16

ORDER

17
18
19 APPROVED AND SO ORDERED:

20 Dated: February 27, 2015


CRAIG M. KELLISON
UNITED STATES MAGISTRATE JUDGE

21
22
23
24
25
26
27
28

Stip. to Extend Def.'s MSJ