BENJAMIN B. WAGNER 1 United States Attorney DONNA L. CALVERT 2 Regional Chief Counsel, Region IX 3 Social Security Administration CAROLYN B. CHEN, CSBN 256628 4 Special Assistant United States Attorney 160 Spear Street, Suite 800 5 San Francisco, California 94105 6 Telephone: (415) 977-8956 Facsimile: (415) 744-0134 7 E-Mail: Carolyn.Chen@ssa.gov Attorneys for Defendant 8 UNITED STATES DISTRICT COURT 9 EASTERN DISTRICT OF CALIFORNIA 10 SACRAMENTO DIVISION 11 12 KELLY A. MOORES, 13

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Case No.: 2:14-cv-02243-EFB

STIPULATION FOR AN EXTENSION OF TIME OF 30 DAYS FOR DEFENDANT'S RESPONSE TO PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

Plaintiff, VS. CAROLYN W. COLVIN, Acting Commissioner of Social Security, Defendant.

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that Defendant shall have an extension of time of an additional 30 days to respond to Plaintiff's motion for summary judgment. This is the first continuance sought by Defendant. The current due date is April 15, 2015. The new due date will be May 15, 2015.

There is good cause for this request. Defendant is seeking this extension due to Defendant's counsel's heavy workload in the last month and an upcoming hearing occurring April 14-15, 2015. In the last month, in addition to her regular district court case workload, Defendant's counsel was re-assigned an Equal Employment Opportunity Commission (EEOC) case that could not be assigned to another attorney, which required immediate action in preparation for a settlement conference that occurred earlier this week. In addition, Defendant's

1	counsel has an upcoming EEOC hearing on April 14-15, 2015, which has involved time-	
2	intensive preparation, including meeting with multiple witnesses and performing other tasks in	
3	preparation for the hearing. Because of the factors described above, defense counsel is requesting	
4	additional time up to fully review the administrative record and research the issues presented by	
5	Plaintiff's motion for summary judgment.	
6	The parties further stipulate that the Court's Scheduling Order shall be modified	
7	accordingly.	
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9		Respectfully submitted,
10	Date: April 9, 2015	LAW OFFICES OF BARBARA ARNOLD
11		s/Barbara Arnold by C.Chen*
12		(As authorized by e-mail on 4/9/2015)
13		BARBARA ARNOLD Attorneys for Plaintiff
14	D . A . 110 2015	•
15	Date: April 9, 2015	BENJAMIN B. WAGNER United States Attorney
16		By <u>s/ Carolyn B. Chen</u>
17		CAROLYN B. CHEN
18		Special Assistant U. S. Attorney
19		Attorneys for Defendant
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22		ORDER
	ADDROVED AND GO ODDEDED	
23	APPROVED AND SO ORDERED.	
24	DATED: April 13, 2015.	Simund F. Bilmon
25		EDMUND F. BRENNAN
26		UNITED STATES MAGISTRATE JUDGE
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