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 8 Attorneys for Defendant

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

13	KELLY A. MOORES,)	Case No.: 2:14-cv-02243-EFB
14	Plaintiff,)	STIPULATION FOR AN EXTENSION OF
15	vs.)	TIME OF 7 DAYS FOR DEFENDANT'S
16	CAROLYN W. COLVIN,)	RESPONSE TO PLAINTIFF'S MOTION
17	Acting Commissioner of Social Security,)	FOR SUMMARY JUDGMENT
18	Defendant.)	

19 IT IS HEREBY STIPULATED, by and between the parties, through their respective
 20 counsel of record, that Defendant shall have an extension of time of an additional 7 days to
 21 respond to Plaintiff's motion for summary judgment. This is the second continuance sought by
 22 Defendant. The current due date is May 15, 2015. The new due date will be May 22, 2015.

23 There is good cause for this request. Defendant is seeking this extension due to
 24 Defendant's counsel's continuing heavy workload in the last month after a multi-day hearing for
 25 an Equal Employment Opportunity Commission (EEOC) that occurred in April 2015. In
 26 addition, since then, in the last two weeks, Defendant was required to work on unanticipated
 27 matters that could not be assigned to another attorney which required immediate attention,
 28 including two other EEOC cases that involved developments in settlement negotiations that

1 occurred this week. Because of the factors described above, defense counsel is requesting
2 additional time up to fully review the administrative record and research the issues presented by
3 Plaintiff's motion for summary judgment.

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

6
7 Respectfully submitted,

8 Date: May 15, 2015

LAW OFFICES OF BARBARA ARNOLD

9
10 *s/ Barbara Arnold by C. Chen**
11 (As authorized by e-mail on 5/15/2015)
12 BARBARA ARNOLD
13 Attorneys for Plaintiff

14 Date: May 15, 2015

BENJAMIN B. WAGNER
United States Attorney

15 By *s/ Carolyn B. Chen*
16 CAROLYN B. CHEN
17 Special Assistant U. S. Attorney

18 Attorneys for Defendant

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20 ORDER

21 APPROVED AND SO ORDERED.

22 DATED: May 18, 2015.

23 
24 EDMUND F. BRENNAN
25 UNITED STATES MAGISTRATE JUDGE
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