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10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA

12) CIVIL NO. 2:14-CV-02391-AC
13)
14 PAMELA LEE LANE,)
15 Plaintiff,) **STIPULATION AND ORDER FOR**
16 vs.) **EXTENSION OF TIME FOR**
17) **DEFENDANT TO RESPOND TO**
18) **PLAINTIFF'S MOTION FOR**
19) **SUMMARY JUDGMENT**
20)
21 CAROLYN W. COLVIN, Acting Commissioner)
22 Of Social Security,)
23)
24)
25)
26)
27)
28)
29 Defendant.

30 IT IS HEREBY STIPULATED, by and between Pamela Lee Lane (Plaintiff) and Carolyn W.
31 Colvin, Acting Commissioner of Social Security (Defendant), by and through their respective counsel of
32 record, that Defendant shall have an extension of time of 14 days to respond to Plaintiff's motion for
33 summary judgment and/or to file any cross-motions thereto. The current deadline is June 25, 2015. The
34 new deadline will be July 9, 2015. This is the second extension of time requested by Defendant, and the
35 third extension of time requested in the above-captioned matter. Defense counsel requests this
36 additional time because, in addition to 9 previously calendared dispositive briefs, defense counsel has
37 had unanticipated oral argument and briefing before the district courts over the past 2 weeks. As a
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STIPULATION & ORDER (CIVIL NO. 2:14-CV-02391-AC)

1 result, defense counsel requires additional time to adequately address the issues Plaintiff raises in her
2 motion for summary judgment. The parties further agree that the Court's case management order shall
3 be modified accordingly

4 Respectfully submitted,

5 LAW OFFICE OF BESS M. BREWER

6 Dated: June 24, 2015

7 /s/ Bess M. Brewer

8 BESS M. BREWER

(As authorized via e-mail on June 24, 2015)

9 Attorney for Plaintiff

10 Dated: June 24, 2015

11 BENJAMIN B. WAGNER

United States Attorney

12 DONNA L. CALVETRT

Regional Chief Counsel, Region IX

13 Social Security Administration

14 By: /s/ Sharon Lahey

15 SHARON LAHEY


Special Assistant United States Attorney

16 Attorneys for Defendant

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18 **ORDER**

19 Good cause appearing, pursuant to stipulation, IT IS SO ORDERED. Defendant shall file her
20 response to Plaintiff's Motion for Summary Judgment on or before July 9, 2015. Plaintiff shall file any
21 reply within 21 days from service of Defendant's response.

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23 DATE: June 25, 2015

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26 ALLISON CLAIRE
27 UNITED STATES MAGISTRATE JUDGE
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