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8 Attorneys for Defendant

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

13 VALERIE LYNN MCKINNEY,	)	Case No.: 2:14-cv-02414-EFB
14 Plaintiff,	)	STIPULATION AND <del>PROPOSED</del> ORDER
15 vs.	)	FOR AN EXTENSION OF TIME
16 CAROLYN W. COLVIN,	)	
17 Acting Commissioner of Social Security,	)	
18 Defendant.	)	

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 21 IT IS HEREBY STIPULATED, by and between the parties, through their respective  
 22 counsel of record, that the time for responding to Plaintiff’s Motion for Summary Judgment be  
 23 extended from August 5, 2015, to September 25, 2015. This is Defendant’s first request for an  
 24 extension of time to respond to Plaintiff’s motion. Defendant respectfully requests this  
 25 additional time because of her counsel’s heavy workload.

26 The parties further stipulate that the Court’s Scheduling Order shall be modified  
 27 accordingly.

1 Counsel apologizes to the Court for any inconvenience caused by this delay.

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3 Dated: August 4, 2015

Respectfully submitted,  
4 /s/ Shellie Lott  
(As authorized via email on 8/4/2015)  
SHELLIE LOTT  
Attorney for Plaintiff

6  
7 Dated: August 4, 2015

BENJAMIN B. WAGNER  
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8 DEBORAH L. STACHEL  
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9 Social Security Administration

10  
11 By: /s/ Ellinor Coder  
ELLINOR CODER  
12 Special Assistant U.S. Attorney  
OF COUNSEL: AMANDA SCHAPPEL  
13 Assistant Regional Counsel

14 Attorneys for Defendant

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16  
17 ORDER

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19 APPROVED AND SO ORDERED.

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21 Dated: August 6, 2015.

  
22 EDMUND F. BRENNAN  
23 UNITED STATES MAGISTRATE JUDGE