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9	UNITED STATES DISTRICT COURT		
10			
11	EASTERN DISTRICT OF CALIFORNIA		
11	SACRAMENTO DIVISION		
12			
13) Case No.: 2:14-cv-02414-EFB	
	VALERIE LYNN MCKINNEY,) $Case 100 2.1 + cv - 02 + 1 + - L1 D$	
14	Plaintiff,	STIPULATION AND PROPOSED ORDER	
15) FOR A SECOND EXTENSION OF TIME	
16	VS.)	
16	CAROLYN W. COLVIN, Acting Commissioner of Social Security,		
17	Acting Commissioner of Social Security,)	
18	Defendant.		
10)	
19	· · · · · · · · · · · · · · · · · · ·		

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Summary Judgment be extended by one week from September 25, 2015, to October 2, 2015. This is Defendant's second request for an extension of time to respond to Plaintiff's motion. Defendant respectfully requests this additional time because of her counsel's continued heavy workload, and an unexpected multi-day training commitment this week.

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

Stip. for Ds Ext.; 2:14-cv-02414-EFB

1	Counsel apologizes to the Co	ourt for	any inconvenience caused by this delay.
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3	Dated: September 24, 2015		Respectfully submitted, /s/ Shellie Lott
4			(As authorized via email on 9/23/2015)
5			SHELLIE LOTT Attorney for Plaintiff
6			
7	Dated: September 24, 2015		BENJAMIN B. WAGNER
8			United States Attorney DEBORAH L. STACHEL
9			Acting Regional Chief Counsel, Region IX Social Security Administration
10		By:	/s/ Ellinor Coder
11		Dy.	ELLINOR CODER
12			Special Assistant U.S. Attorney OF COUNSEL: AMANDA SCHAPEL
13			Assistant Regional Counsel
14			Attorneys for Defendant
15			
16			
17			<u>ORDER</u>
18			
19 20	APPROVED AND SO ORDERED.		
20		9	Aming F. Bieman
21 22	Dated: September 24, 2015.		MUND F. BRENNAN
22 23		UI	NITED STATES MAGISTRATE JUDGE
23 24			
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	Stip. for Ds Ext.; 2:14-cv-02414-EFB		2