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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION**

JESSE FLORES,)	Case No.: 2:14-CV-02650-AC
)	
Plaintiff,)	STIPULATION AND ORDER FOR A FIRST
)	EXTENSION OF 30 DAYS FOR
vs.)	DEFENDANT TO RESPOND TO
)	PLAINTIFF’S MOTION FOR SUMMARY
CAROLYN W. COLVIN,)	JUDGMENT AND FILE HER CROSS-
Acting Commissioner of Social Security,)	MOTION FOR SUMMARY JUDGMENT
)	
Defendant.)	
)	

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that Defendant shall have a first extension of time of 30 days to respond to Plaintiff’s Motion for Summary Judgment and to file her Cross-Motion for Summary Judgment. This first extension is requested due to Defendant’s counsel’s exceptionally heavy workload at this time, including three District Court briefs due during this shortened week as well as an employment law matter that is in active litigation before the Merit Systems Protection Board. The additional time requested is needed to adequately research the issues Plaintiff has presented. The new due date will be June 25, 2015.

The parties further stipulate that the remaining deadlines in the Court’s Scheduling Order shall be modified accordingly.

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Respectfully submitted,

Dated: May 26, 2015

/s/ *Stephen A. Valizan
(*as authorized by email on May 26, 2015)
STEPHEN A. VALIZAN
LAW OFFICE OF ELIZABETH GADE, INC.
Attorney for Plaintiff

Dated: May 26, 2015


BENJAMIN B. WAGNER
United States Attorney
DONNA L. CALVERT
Regional Chief Counsel, Region IX,
Social Security Administration

By: /s/ Jennifer A. Kenney
JENNIFER A. KENNEY
Special Assistant U.S. Attorney
Attorneys for Defendant

ORDER

APPROVED AND SO ORDERED.

DATED: May 27, 2015


ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE