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10 **UNITED STATES DISTRICT COURT**  
11 **EASTERN DISTRICT OF CALIFORNIA**

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13 TIMOTHY LEE HENRICUS, ) Case No.: 2:14-cv-02699-KJN  
14 Plaintiff, ) STIPULATION AND ~~PROPOSED~~ ORDER  
15 vs. ) FOR AN EXTENSION OF TIME  
16 CAROLYN W. COLVIN, )  
Acting Commissioner of Social Security, )  
17 Defendant. )  
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20 IT IS HEREBY STIPULATED, by and between the parties, through their respective  
21 counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary  
22 Judgment be extended from July 23, 2015, to and including August 27, 2015. This is  
23 Defendant's first request for an extension of time to respond to Plaintiff's motion. Defense  
24 counsel needs the additional time to further review the file and prepare a response in this matter  
25 due to a heavy workload, including several other district court cases, despite due diligence.  
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1 The parties further stipulate that the remaining dates in the Court's Scheduling Order  
2 shall be modified accordingly.

3 Defense counsel apologizes to the Court for any inconvenience caused by this delay.

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5 Respectfully submitted,

6 LAW OFFICE OF ANA L. MOLLEDA

7 Dated: July 22, 2015

/s/ Lynn M. Harada for Ana L. Molleda\*

(\*as authorized via email on 7/22/15)

8 ANA L. MOLLEDA

9 Attorney for Plaintiff

10  
11 Dated: July 22, 2015

BENJAMIN B. WAGNER

United States Attorney

12 DONNA L. CALVERT

13 Regional Chief Counsel, Region IX

14 Social Security Administration

15 By: /s/ Lynn M. Harada

16 LYNN M. HARADA

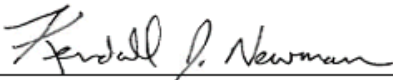
Special Assistant U.S. Attorney

17 Attorneys for Defendant

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20 ORDER:

21 APPROVED AND SO ORDERED:

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23 Dated: July 24, 2015

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25 \_\_\_\_\_  
KENDALL J. NEWMAN  
26 UNITED STATES MAGISTRATE JUDGE  
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