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5	Attorney for Plaintiff, KIMBERLY Y. MADKINS
6	
7	IN THE UNITED STATES DISTRICT COURT
8	EASTERN DISTRICT OF CALIFORNIA
9	KIMBERLY Y. MADKINS,) Case No. 2:14-cv-02750-EFB
10	Plaintiff,
11	v. 2 STIPULATION AND [PROPOSED] ORDER FOR AN EXTENSION OF TIME
12	CAROLYN W. COLVIN,) Commissioner of Social Security,)
13)
14	Defendant.
15)
16	IT IS STIPULATED, by and between the parties, through their respective counsel of record,
17	that the time for Plaintiff to file her Motion for Summary Judgment be extended for 30 days until
18	July 27, 2015. This is Plaintiff's first request for an extension of time to file her Motion for
19	Summary Judgment. Despite due diligence, Plaintiff's counsel requires additional time to further
20	review the file and prepare Plaintiff's motion because counsel has been out of town on a planned
21	vacation and attending to other deadlines in unrelated matters during this time period.
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1	The parties further stipulate that all other scheduling matters set forth in the Court's Scheduling
2	Order will remain unchanged.
3	Dated: June 24, 2015 Respectfully submitted,
4	
5	By: /s/ Jared Walker
6	Jared T. Walker, Attorney for Plaintiff
7	
8	Dated: June 24, 2015 BENJAMIN B. WAGNER United States Attorney
9	DONNA CALVERT Regional Chief Counsel, Region IX
10	Social Security Administration
11	By: /s/ Chantal R. Jenkins*
12	$\frac{156 \text{ Channel R. Services}}{(* \text{as authorized via email on } 6/24/15)}$ Chantal R. Jenkins,
13	Special Assistant United States Attorney
14	
15	ORDER
16	
17	APPROVED AND SO ORDERED. All other deadlines are modified accordingly.
18	Dated: June 29, 2015.
19	Smin Filisman
20	EDMUND F. BRENNAN
21	UNITED STATES MAGISTRATE JUDGE
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