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8 Attorneys for Defendant

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

13	KIMBERLY Y. MADKINS,	)	Case No.: 2:14-CV-02750-EFB
14		)	
15	Plaintiff,	)	STIPULATION AND <del>PROPOSED</del> ORDER
16		)	FOR AN EXTENSION OF TIME
17	vs.	)	
18	CAROLYN W. COLVIN,	)	
19	Acting Commissioner of Social Security,	)	
		)	
	Defendant.	)	

20 IT IS HEREBY STIPULATED, by and between the parties, through their respective  
 21 counsel of record, that Defendant shall have an extension of time of an additional 30 days to  
 22 respond to Plaintiff's opening brief. The current due date is August 26, 2015. The new due date  
 23 will be September 25, 2015. This is Defendant's first request for an extension.

24 Defendant respectfully requests this additional time because Defendant's counsel is  
 25 managing a heavy caseload. Defendant's counsel is currently responsible for managing and  
 26 briefing forty-one other matters pending before the District Courts. Defendant's counsel has  
 27 completed five such briefs since Plaintiff filed her opening brief. Counsel is also in the process  
 28

Stipulation and ~~Proposed~~ Order for an Extension of Time; 2:14-cv-02750-EFB

1 of completing a ninth circuit appellate brief, which must be reviewed by the Office of General  
2 Counsel and the United States Department of Justice (DOJ). In addition, counsel is representing  
3 the agency in a federal employment discrimination case and is in the process of gathering and  
4 serving documents for discovery.

5 This request is made in good faith with no intention to unduly delay the proceedings.

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

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

9  
10 Respectfully submitted,

11 Dated: August 24, 2015

/s/ Jared Walker by Chantal R. Jenkins\*  
As authorized via email on August 24, 2015  
JARED T. WALKER  
Attorney for Plaintiff

14  
15 Dated: August 24, 2015

BENJAMIN B. WAGNER  
United States Attorney  
DEBORAH LEE STACHEL  
Acting Regional Chief Counsel, Region IX  
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18  
19 By: /s/ Chantal R. Jenkins  
20 CHANTAL R. JENKINS  
21 Special Assistant United States Attorney

22  
23 ORDER

24  
25 APPROVED AND SO ORDERED.

26 Dated: August 25, 2015.

  
EDMUND F. BRENNAN  
UNITED STATES MAGISTRATE JUDGE