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10 Attorneys for Defendant

11  
 12 UNITED STATES DISTRICT COURT  
 13 EASTERN DISTRICT OF CALIFORNIA  
 14 SACRAMENTO DIVISION

15 ALEXANDRE DO MACK, ) Case No. 2:14-cv-02852-AC  
 16 )  
 17 Plaintiff, )  
 18 v. ) STIPULATION AND [PROPOSED]  
 19 ) ORDER FOR AN EXTENSION OF  
 20 ) TIME  
 21 CAROLYN W. COLVIN, )  
 22 Commissioner of Social Security, )  
 23 )  
 24 Defendant. )  
 25 )

26 IT IS STIPULATED, by and between the parties, through their respective  
 27 counsel of record, that the time for Defendant to file her Cross-Motion for Summary  
 28 Judgment be extended for 30 days until February 8, 2016. This is Defendant's first  
 request for an extension of time to file her Cross-Motion for Summary Judgment.  
 Defense counsel requires additional time to fully review the administrative record

1 and consider the government's position due to the recent holiday/leave schedule, as  
2 well as a high work load during this time period. Plaintiff's counsel does not object  
3 and agrees that all subsequent deadlines should be accordingly extended.  
4

5 Respectfully submitted,

6  
7 Date: January 6, 2016

8 By: /s/ Geri N. Kahn\*  
9 Geri N. Kahn  
10 Attorney for Plaintiff  
11 (\* By e-mail authorization on 01/06/16)

12 Dated: January 6, 2016

13 BENJAMIN B. WAGNER  
14 United States Attorney  
15 DEBORAH LEE STACHEL  
16 Acting Regional Chief Counsel, Region IX  
17 Social Security Administration

18 By: /s/ Donna W. Anderson  
19 DONNA W. ANDERSON  
20 Special Assistant U.S. Attorney  
21 Attorneys for Defendant

22 ORDER

23 APPROVED AND SO ORDERED:

24  
25 Dated: January 6, 2016

26   
27 \_\_\_\_\_  
28 HON. ALLISON CLAIRE  
United States Magistrate Judge