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

13 MONICA WATTS,) Case No.: 2:15-cv-186-KJN
14 Plaintiff,)
15 vs.) STIPULATION AND PROPOSED ORDER
16 CAROLYN W. COLVIN,) FOR AN EXTENSION OF TIME
Acting Commissioner of Social Security,)
17 Defendant.)
18)
19)

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21 IT IS HEREBY STIPULATED, by and between the parties, through their respective
22 counsel of record, that the time for responding to Plaintiff's Motion for Summary Judgment be
23 extended from August 28, 2015, to September 28, 2015. This is Defendant's first request for an
24 extension of time to respond to Plaintiff's motion. Defendant respectfully requests this
25 additional time because Defendant's counsel has a higher than normal workload and needs
26 additional time.

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

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

Respectfully submitted,

Dated: August 25, 2015

/s/ Bess M. Brewer
(*as authorized via e-mail on August 24, 2015)
BESS M. BREWER
Attorney for Plaintiff

Dated: August 25, 2015

BENJAMIN B. WAGNER
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DEBORAH LEE STACHEL
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By: /s/ Marcelo Illarmo
MARCELO ILLARMO
Special Assistant United States Attorney

Attorneys for Defendant

ORDER

APPROVED AND SO ORDERED:

Dated: 08/26/15



KENDALL J. NEWMAN
UNITED STATES MAGISTRATE JUDGE