BENJAMIN B. WAGNER 1 United States Attorney DEBORAH LEE STACHEL 2 Acting Regional Chief Counsel, Region IX 3 Social Security Administration MARCELO ILLARMO (MABN 670079) 4 Special Assistant United States Attorney 160 Spear Street, Suite 800 5 San Francisco, California 94105 6 Telephone: (415) 977-8944 Facsimile: (415) 744-0134 7 E-Mail: Marcelo.Illarmo@ssa.gov 8 Attorneys for Defendant 9 UNITED STATES DISTRICT COURT 10 EASTERN DISTRICT OF CALIFORNIA 11 **SACRAMENTO** 12 13 Case No.: 2:15-cv-186-KJN MONICA WATTS, 14 STIPULATION AND PROPOSED ORDER FOR A SECOND EXTENSION OF TIME 15 Plaintiff, 16 VS. CAROLYN W. COLVIN, 17 Acting Commissioner of Social Security, 18 Defendant. 19 20 IT IS HEREBY STIPULATED, by and between the parties, through their respective 21 counsel of record, that the time for responding to Plaintiff's Motion for Summary Judgment be 22 extended from September 28, 2015, to October 28, 2015. This is Defendant's second request for 23 an extension of time to respond to Plaintiff's motion. Defendant respectfully requests this 24 additional time because Defendant's counsel has a higher than normal workload and needs 25 additional time. 26 The parties further stipulate that the Court's Scheduling Order shall be modified 27 accordingly. 28

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2	Counsel apologizes to the Court for any inconvenience caused by this delay.	
3		Respectfully submitted,
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5	Dated: September 25, 2015	/s Bess M. Brewer (*as authorized via e-mail on September 25, 2015)
6		BESS M. BREWER Attorney for Plaintiff
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9	Dated: September 25, 2015	BENJAMIN B. WAGNER United States Attorney
10		DEBORAH LEE STACHEL
11		Acting Regional Chief Counsel, Region IX Social Security Administration
12	F	By: <u>/s/ Marcelo Illarmo</u>
13		MARCELO ILLARMO Special Assistant United States Attorney
14		Attornava for Defendant
15		Attorneys for Defendant
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17		<u>ORDER</u>
18 19		
20	APPROVED AND SO ORDERED:	
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22	Dated: September 29, 2015	$\mathcal{L}_{\mathbf{A}}$
23		KENDALLI NEVMAN
24		UNITED STATES MAGISTRATE JUDGE
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