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9 Attorneys for Defendant

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

13 DEBORAH ANNA RODRIGUEZ,) Case No.: 2:15-cv-00231-CKD
14)
Plaintiff,) STIPULATION AND ~~PROPOSED~~ ORDER
15) FOR AN EXTENSION OF TIME TO
vs.) RESPOND TO PLAINTIFF'S BRIEF
16)
CAROLYN W. COLVIN,)
17 Acting Commissioner of Social Security,)
18 Defendant.)

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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 September 16, 2015. The new due
23 date will be October 16, 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. Counsel is also in the
27 process of completing a ninth circuit appellate brief, which must be reviewed by the Office of
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1 General Counsel and the United States Department of Justice (DOJ). In addition, counsel is
2 representing the agency in a federal employment discrimination case and is in the process of
3 gathering and serving documents for discovery.

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

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

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

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9 Respectfully submitted,

10 Dated: September 10, 2015

/s/ Jesse S. Kaplan by Chantal R. Jenkins*
As authorized via email on September 10, 2015
JESSE S. KAPLAN
Attorney for Plaintiff

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14 Dated: September 10, 2015

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

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18 By: /s/ Chantal R. Jenkins
19 CHANTAL R. JENKINS
20 Special Assistant United States Attorney

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22 ORDER

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24 APPROVED AND SO ORDERED:

25 Dated: September 14, 2015

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27 _____
28 CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE