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

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

20 IT IS HEREBY STIPULATED, by and between the parties, through their respective  
21 counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary  
22 Judgment (Docket No. 14) (the "motion") be extended by fourteen (14) days, from October 16,  
23 2015 to October 30, 2015. This is Defendant's second request for an extension of time and the  
24 third extension of time in the above-captioned matter. Defendant requests this extension because  
25 the attorney responsible for responding to Plaintiff's Motion for Summary Judgment recently  
26 returned to the office from a lengthy unanticipated medical leave and requires additional time to  
27 adequately address the issues Plaintiff raises in her motion.

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

3 Respectfully submitted,

4 Dated: October 15, 2015

/s/ Jesse S. Kaplan\*  
JESSE S. KAPLAN  
(\*As authorized by e-mail on October 15, 2015)

6 Attorneys for Plaintiff

7 Dated: October 15, 2015

BENJAMIN B. WAGNER  
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11 By: /s/ Sharon Lahey  
12 SHARON LAHEY  
13 Special Assistant United States Attorney  
14 Attorneys for Defendant

15  
16 **ORDER**

17  
18 IT IS HEREBY ORDERED, pursuant to stipulation, good cause appearing, that  
19 Defendant shall respond to Plaintiff's Motion for Summary Judgment on or before October 30,  
20 2015. It is further ordered that any reply thereto shall be filed on or before November 19, 2015.

21 Dated: October 19, 2015

Carolyn K. Delaney  
CAROLYN K. DELANEY  
UNITED STATES MAGISTRATE JUDGE