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10 ATTORNEYS FOR DEFENDANT

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

14)
 15 MELISSA HACKWELL CLARK,)
 Plaintiff,)
 16 vs.)
 17 CAROLYN W. COLVIN, Acting Commissioner)
 Of Social Security,)
 18 Defendant.)
 19)
 20)

CIVIL NO. 2:15-cv-00375 EFB
**STIPULATION AND PROPOSED
 ORDER FOR A FIRST EXTENSION
 OF 30 DAYS FOR DEFENDANT TO
 RESPOND TO PLAINTIFF'S MOTION
 FOR SUMMARY JUDGMENT
 AND/OR TO FILE ANY CROSS-
 MOTIONS**

21 IT IS HEREBY STIPULATED, by and between Melissa Hackwell Clark (Plaintiff) and
 22 Carolyn W. Colvin, Acting Commissioner of Social Security (Defendant), by and through their
 23 respective counsel of record, that Defendant shall have an extension of time of thirty (30) days to
 24 respond to Plaintiff's motion for summary judgment and/or to file any cross-motions. The current due
 25 date is November 18, 2015. The new due date will be December 21, 2015. This is the first extension
 26 of time requested by Defendant and the fourth extension of time requested in the above-captioned
 27 matter. Defense counsel requires additional time to adequately address the issues Plaintiff raises in her
 28 motion for summary judgment due to workload as well as ongoing medical leave.

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

2 Respectfully submitted,

3
4 Dated: November 19, 2015

BESS M. BREWER

5 By: /s/ Bess M. Brewer*

6 BESS M. BREWER

(*As authorized by email on November 19, 2015)

7 Attorneys for Plaintiff

8 Dated: November 19, 2015

BENJAMIN B. WAGNER

9 United States Attorney

10 By: /s/ Sharon Lahey

11 SHARON LAHEY

Special Assistant U. S. Attorney

12 Attorneys for Defendant

13
14 **ORDER**

15 Pursuant to stipulation, good cause appearing, IT IS SO ORDERED. Defendant shall file her
16 response to Plaintiff's motion for summary judgment on or before December 21, 2015. Plaintiff shall
17 file any reply thereto on or before January 11, 2016.

18 DATED: November 19, 2015.

19 

20 EDMUND F. BRENNAN

21 UNITED STATES MAGISTRATE JUDGE