BENJAMIN B. WAGNER 1 United States Attorney DEBORAH LEE STACHEL 2 Acting Regional Chief Counsel, Region IX 3 Social Security Administration JACOB M. MIKOW, CSBN 238045 4 Special Assistant United States Attorney 160 Spear Street, Suite 800 5 San Francisco, CA 94105 6 Telephone: 415-977-8976 Fax: 415-744-0134 7 Jacob.Mikow@ssa.gov 8 Attorneys for Defendant 9 UNITED STATES DISTRICT COURT 10 EASTERN DISTRICT OF CALIFORNIA 11 12 Case No.: 2:15-CV-00385-KJN TAMMY SUE COOPRIDER. 13 STIPULATION AND PROPOSED ORDER Plaintiff. FOR AN EXTENSION OF TIME 14 VS. 15 16 CAROLYN W. COLVIN, Acting Commissioner of Social Security, 17 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 Opening Brief be extended from 22 January 21, 2016 to February 22, 2016. This is Defendant's first request for an extension of time 23 to respond to Plaintiff's motion. An extension of time is needed given Defendant counsel's 24 workload, and in order for counsel to review and respond to the issues raised in Plaintiff's 25 motion. The parties further stipulate that the Court's Scheduling Order shall be modified 26 accordingly. 27 28

1			Respectfully submitted,
2	Dated: 1/20/2016		/s/ Joseph Clayton Fraulob (As authorized via email on)
3			JOSEPH CLAYTON FRAULOB
4			Attorney for Plaintiff
5	Dated: 1/20/2016		BENJAMIN B. WAGNER
6			United States Attorney
7			DEBORAH LEE STACHEL Acting Regional Chief Counsel, Region IX
8			Social Security Administration
9   10	]	Ву:	/s/ Jacob M. Mikow JACOB M. MIKOW
11			Special Assistant United States Attorney Attorneys for Defendant
12	OF COUNSEL:		
13	In Seon Jeong		
14	Assistant Regional Counsel		
15			
16			
17			<u>ORDER</u>
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19	APPROVED AND SO ORDERED:		
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21	Dated: January 21, 2016		<i>1</i> , , ,
22			Kerdal J. Newman
23			KENDALL J. NEWMAN UNITED STATES MAGISTRATE JUDGE
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