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9 Attorneys for Defendant

10 **UNITED STATES DISTRICT COURT**  
11 **EASTERN DISTRICT OF CALIFORNIA**

13 BETTY GARIBAY,	)	No. 2:15-cv-00452-EFB (TEMP)
	)	
14 Plaintiff,	)	STIPULATION AND ORDER FOR AN
	)	EXTENSION OF TIME
15 vs.	)	
16 CAROLYN W. COLVIN,	)	
Acting Commissioner of Social Security,	)	
17	)	
18 Defendant.	)	

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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 be extended 35 days to and including February 19, 2016. This is Defendant's first  
23 request for an extension of time to respond to Plaintiff's motion. Defense counsel needs the  
24 additional time to further review the file and prepare a response in this matter due to pre-  
25 approved leave during the holidays as well as a heavy workload, including several other district  
26 court cases, despite due diligence.

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

3 Defense counsel apologizes to the Court for any inconvenience caused by this delay.

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5 Respectfully submitted,

6 Dated: January 13, 2016

/s/ Lynn M. Harada for Jeffrey R. Duarte\*

(\*as authorized via email on 1/12/16)

7 JEFFREY R. DUARTE

8 Attorney for Plaintiff

9  
10 Dated: January 13, 2016

BENJAMIN B. WAGNER

11 United States Attorney

12 DEBORAH LEE STACHEL

Acting Regional Chief Counsel, Region IX

13 Social Security Administration

14 By: /s/ Lynn M. Harada

15 LYNN M. HARADA

Special Assistant U.S. Attorney

16 Attorneys for Defendant

17  
18 ORDER

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20 IT IS SO ORDERED.

21 DATED: January 15, 2016.



22 EDMUND F. BRENNAN

23 UNITED STATES MAGISTRATE JUDGE  
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26  
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