

1 BENJAMIN B. WAGNER
 United States Attorney
 2 DEBORAH LEE STACHEL
 Acting Regional Chief Counsel, Region IX
 3 Social Security Administration
 4 LYNN M. HARADA, CSBN 267616
 Special Assistant United States Attorney
 5 160 Spear Street, Suite 800
 San Francisco, California 94105
 6 Telephone: (415) 977-8977
 7 Facsimile: (415) 744-0134
 E-Mail: Lynn.Harada@ssa.gov

8 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
15	vs.)	EXTENSION OF TIME
16	CAROLYN W. COLVIN,)	
17	Acting Commissioner of Social Security,)	
18	Defendant.)	

19

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 30 days to and including March 21, 2016. This is Defendant’s second
 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 a heavy
 25 workload, including a Ninth Circuit case, several other district court cases, and other substantive,
 26 non-litigation matters, despite due diligence.

27 ///

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.

4
5 Respectfully submitted,

6 Dated: February 17, 2016

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

(*as authorized via email on 2/17/16)

7 JEFFREY R. DUARTE

8 Attorney for Plaintiff

9
10 Dated: February 17, 2016

BENJAMIN B. WAGNER

11 United States Attorney

DEBORAH LEE STACHEL

12 Acting Regional Chief Counsel, Region IX

13 Social Security Administration

14 By: /s/ Lynn M. Harada

LYNN M. HARADA

15 Special Assistant U.S. Attorney

16 Attorneys for Defendant

17
18
19 **ORDER**

20 Pursuant to the parties' stipulation and good cause appearing, IT IS SO ORDERED.

21 DATED: February 22, 2016.

22 

EDMUND F. BRENNAN

23 UNITED STATES MAGISTRATE JUDGE

24

25

26

27

28