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

13 KATHLEEN P. DORAN,)	Case No.: 2:15-cv-00777-CMK
)	
14 Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	FOR AN EXTENSION OF TIME
15 vs.)	
16 CAROLYN W. COLVIN,)	
Acting Commissioner of Social Security,)	
)	
17 Defendant.)	
18)	

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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 March 24, 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 a heavy
 25 workload, including several other district 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: February 17, 2016

/s/ Lynn M. Harada for Jacqueline Forslund*

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

JACQUELINE FORSLUND

Attorney for Plaintiff

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10 Dated: February 17, 2016

BENJAMIN B. WAGNER

United States Attorney

DEBORAH LEE STACHEL

Acting Regional Chief Counsel, Region IX

Social Security Administration

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14 By: /s/ Lynn M. Harada

LYNN M. HARADA

Special Assistant U.S. Attorney

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16 Attorneys for Defendant

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19 ORDER:

20 APPROVED AND SO ORDERED:

21 Dated: February 19, 2016


CRAIG M. KELLISON
UNITED STATES MAGISTRATE JUDGE

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