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BENJAMIN B. WAGNER 1 United States Attorney DEBORAH LEE STACHEL 2 Acting Regional Chief Counsel, Region IX 3 Social Security Administration MICHAEL K. MARRIOTT, CSBN 280890 4 Special Assistant United States Attorney 160 Spear Street, Suite 800 5 San Francisco, California 94105 6 Telephone: (415) 977-8934 Facsimile: (415) 744-0134 7 E-Mail: Shea.Bond@ssa.gov 8 Attorneys for Defendant 9 10 UNITED STATES DISTRICT COURT 11 EASTERN DISTRICT OF CALIFORNIA 12 SACRAMENTO DIVISION 13 14 R.P. BY AND THROUGH HER Case No. 2:15-cv-01366-AC 15 GUARDIAN AD LITEM) TRACIE PEREZ, STIPULATION FOR EXTENSION OF 16 TIME AND PROPOSED ORDER Plaintiff, 17 18 CAROLYN W. COLVIN, 19 Acting Commissioner of Social Security, 20 21 Defendant. 22 The parties hereby stipulate by counsel, with the Court's approval as indicated by 23 24

The parties hereby stipulate by counsel, with the Court's approval as indicated by issuance of the attached Order, that Defendant shall have a first extension of time of 30 days to respond to Plaintiff's Opening Brief up to and including February 12, 2016. The response is currently due January 13, 2016. This extension is being sought so that the parties can further consider settlement.

The parties also stipulate that the scheduling order shall be modified accordingly.

1 – Stipulation and Order Extending Def's Time

1		Respectfully submitted,
2	Dated: January 12, 2016	/s/ Young Chul Cho * YOUNG CHUL CHO
4		(*as authorized by email on January 12, 2016) Attorney for Plaintiff
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6	Dated: January 12, 2016	BENJAMIN B. WAGNER
7		United States Attorney DEBORAH LEE STACHEL
8		Acting Regional Chief Counsel, Region IX Social Security Administration
9	Ву:	<u>/s/ Michael K. Marriott</u> MICHAEL K. MARRIOTT
11		Special Assistant U.S. Attorney Attorneys for Defendant
12		Attorneys for Defendant
13		ORDER
14	APPROVED AND SO ORDERED.	
15 16	DATED: January 12, 2016	
17		allison Claire
18		UNITED STATES MAGISTRATE JUDGE
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