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8 Attorneys for Defendant

9 **UNITED STATES DISTRICT COURT**
10 **EASTERN DISTRICT OF CALIFORNIA**
11 **SACRAMENTO DIVISION**

13 ROBERT BROWN,) Case No.: 2:15-CV-01430-CKD
14)
Plaintiff,) STIPULATION AND ORDER
15) FOR AN EXTENSION OF TIME
vs.)
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 Defendant shall have an extension of time to February 17, 2016 to
22 respond to Plaintiff's opening brief. The current due date is February 14, 2016. This is
23 Defendant's first request for an extension. Defendant respectfully requests this additional time
24 due to a heavy workload. Defendant's counsel has a Ninth Circuit brief due in February and has
25 to represent the agency in a Ninth Circuit oral argument in another case that originally belonged
26 to another attorney. In addition, Defendant's counsel is currently responsible for managing and
27 briefing forty-three other matters pending before the District Courts.
28

1 This request is made in good faith with no intention to unduly delay the proceedings.
2 The parties further stipulate that the Court's Scheduling Order shall be modified
3 accordingly.

4 Counsel apologizes to the Court for any inconvenience caused by this delay.

5
6 Respectfully submitted,

7
8 Dated: January 26, 2016

/s/ Richard A. Whitaker by Chantal R. Jenkins*

9 As authorized by Erika Ranson on behalf of Richard
10 A. Whitaker via email on January 26, 2016
11 Richard Allen Whitaker, Esq.
12 Attorney for Plaintiff

13 Dated: January 26, 2016

14 BENJAMIN B. WAGNER
15 United States Attorney
16 DEBORAH LEE STACHEL
17 Acting Regional Chief Counsel, Region IX
18 Social Security Administration

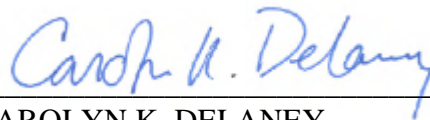
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20 By: /s/ Chantal R. Jenkins

21 CHANTAL R. JENKINS
22 Special Assistant United States Attorney

23
24 ORDER

25 APPROVED AND SO ORDERED:

26 Dated: January 27, 2016

27 

28 CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE