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Attorneys for Defendant

10 UNITED STATES DISTRICT COURT  
 11 EASTERN DISTRICT OF CALIFORNIA - SACRAMENTO

13 SEAN MICHAEL EMMONS,	)	CIVIL NO. 2:15-cv-01509-EFB
	)	
14 Plaintiff,	)	<b>STIPULATION AND PROPOSED</b>
15 v.	)	<b>ORDER FOR A FIRST EXTENSION OF</b>
	)	<b>TIME FOR DEFENDANT TO RESPOND</b>
16 CAROLYN W. COLVIN,	)	<b>TO PLAINTIFF'S MOTION FOR</b>
	)	<b>SUMMARY JUDGMENT</b>
17 Acting Commissioner of Social Security,	)	
	)	
18 Defendant.	)	
	)	
	)	

21 IT IS HEREBY STIPULATED, by and between the parties, through their respective  
 22 counsel of record, that Defendant shall have a first extension of time of 45 days to respond to  
 23 Plaintiff's Motion for Summary Judgment. There is good cause for this extension because of  
 24 Defendant's Counsel's workload and the holidays. Despite his diligent efforts, competing

1 deadlines necessitate an extension, including a scheduled oral argument before the Ninth Circuit.  
2 Additionally, Defendant needs additional time to respond to Plaintiff's arguments. Given these  
3 factors, Defendant respectfully requests an extension and Plaintiff also consents to this extension.

4 The current due date is January 7, 2016. The new due date will be February 22, 2016.  
5 The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

7 Respectfully submitted,

9 Dated: December 30, 2015

10 /s/ Henry L. Chi for John Vincent Johnson\*  
11 (\*by email authorization on December 30, 2015)  
12 John Vincent Johnson  
13 Attorney for Plaintiff

14 Dated: December 30, 2015

15 BENJAMIN B. WAGNER  
16 United States Attorney

17 By: /s/ Henry L. Chi  
18 Henry L. Chi  
19 Special Assistant U.S. Attorney

20 Attorneys for Defendant

21 ORDER

22 APPROVED AND SO ORDERED.

23 DATED: January 4, 2016

24   
25 EDMUND F. BRENNAN  
26 UNITED STATES MAGISTRATE JUDGE