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 8 Attorneys For Defendant

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

CHERIE BLASQUEZ-TRACY,	)	Case No. 2:15-CV-2621-CKD
Plaintiff,	)	
v.	)	UNOPPOSED MOTION FOR AN
CAROLYN W. COLVIN, Acting	)	EXTENSION OF TIME
Commissioner of Social Security,	)	(FIRST REQUEST)
Defendant.	)	
	)	

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 19 Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (“Defendant”)  
 20 respectfully requests that the Court extend the time for Defendant to file her Answer to the Complaint,  
 21 due on May 12, 2016, by 29 days, through and including June 10, 2016.

22 An extension of time is needed in order to prepare Defendant’s Answer because the  
 23 Commissioner is still in the process of assembling and finalizing the administrative record. This request  
 24 is made in good faith with no intention to unduly delay the proceedings.

1 Counsel for Defendant conferred with Plaintiff's counsel's by email, who has no opposition to  
2 this motion on May 12, 2016.

3 The parties further stipulate the Court's Scheduling Order shall be modified accordingly.

4 Counsel for Defendant apologizes to the Court and opposing counsel for any inconvenience  
5 caused by this delay.

6 Respectfully submitted,

7  
8 Date: May 12, 2016

9 /s/ Jesse S. Kaplan, csb#103726  
10 JESSE S. KAPLAN,  
11 Attorney for Plaintiff

12 PHILLIP A. TALBERT  
13 Acting United States Attorney

14 By: /s/ Richard M. Rodriguez  
15 RICHARD M. RODRIGUEZ  
16 Special Assistant United States Attorney

17 Attorneys for Defendant

18 **ORDER**

19  
20 **APPROVED AND SO ORDERED:**

21 **Dated: May 16, 2016**

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23 \_\_\_\_\_  
24 CAROLYN K. DELANEY  
25 UNITED STATES MAGISTRATE JUDGE  
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