1 MELINDA L. HAAG, CSBN 132612 United States Attorney DONNA L. CALVERT, ISBN 6191786 2 Acting Regional Chief Counsel, Region IX 3 Social Security Administration FRANCESCÓ BENAVIDES, CSBN 258924 4 Special Assistant United States Attorney 160 Spear Street, Suite 800 5 San Francisco, California 94105-1545 Telephone: (415) 977-8978 Facsimile: (415) 744-0134 6 Email: francesco.benavides@ssa.gov 7 Attorneys for Defendant 8 UNITED STATES DISTRICT COURT 9 NORTHERN DISTRICT OF CALIFORNIA 10 11 PAMELA RENE THOMPSON, CIVIL NO. 3:13-cv-01389-JCS 12 Plaintiff, STIPULATION AND PROPOSED 13 ORDER FOR EXTENSION OF TIME VS. FOR DEFENDANT TO FILE 14 CROSS-MOTION FOR SUMMARY CAROLYN W. COLVIN, 15 JUDGMENT AND OPPOSITION TO PLAINTIFF'S MOTION FOR Commissioner of Social Security, 16 SUMMARY JUDGMENT Defendant. 17 18 IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of 19 record, that Defendant shall have an extension of time of 30 days to file a Cross-Motion for Summary 20 21 Judgment and Opposition to Plaintiff's Motion for Summary Judgment. There is good cause for this 22 extension because counsel for the Commissioner presently has an unusually robust caseload. 23 The new due date for Defendant's Cross-Motion and Opposition will be February 23, 2014. 24 Counsel for Defendant sincerely apologizes to the Court and to Plaintiff for any inconvenience this may 25 cause. 26 2.7 28 Stip. & Prop. Order for Extension, 13-CV-01389-JCS

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1	Respectfully submitted,
2	Dated: January 24, 2014 By: /s/ Brian Patrick Hogan
3	(as authorized via-email) BRIAN PATRICK HOGAN
4	Rubicon Legal Services
5	Attorney for Plaintiff
6	
7	MELINDA L. HAAG
8	United States Attorney
9	Dated: January 24, 2014 By: <u>/s/ Francesco P. Benavides</u>
10	FRANCESCO P. BENAVIDES
11	Special Assistant United States Attorney
12	Attorneys for Defendant
13	Of Counsel:
14	DONNA L. CALVERT,
15	Acting Regional Chief Counsel
16	HEATHER M. MOSS
17	Assistant Regional Counsel
18	
19	
20	<u>ORDER</u>
21	PURSUANT TO STIPULATION, IT IS SO ORDERED.
22	DATED: January 28, 2014
23	HON. JOSEPHEC UNITED STATE
24	Judge Joseph C. Spero
25	THE DISTRICT OF CE
26	DISTRICT
27	

Stip. & Prop. Order for Extension, 13-CV-01389-JCS

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