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8 Attorneys for Defendant  
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10 **UNITED STATES DISTRICT COURT**  
 11 **NORTHERN DISTRICT OF CALIFORNIA**

13 CLAIRE BLANCHARD,  
 14 Plaintiff,

15 vs.

16 CAROLYN W. COLVIN,  
 Acting Commissioner of Social Security,  
 17 Defendant.  
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) Case No.: 3:14-cv-03143-VC  
 )  
 ) STIPULATION AND ~~PROPOSED~~ ORDER  
 ) FOR AN EXTENSION OF TIME

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 20 IT IS HEREBY STIPULATED, by and between the parties, through their respective  
 21 counsel of record, that the time for Defendant to respond to Plaintiff’s Motion for Summary  
 22 Judgment be extended for 45 days or from December 29, 2014 until February 12, 2015. This is  
 23 Defendant’s first request for an extension of time to respond to Plaintiff’s motion. Defense  
 24 counsel needs additional time to properly address the issues raised in Plaintiff’s Motion for  
 25 Summary Judgment due to pre-approved leave as well as a heavy workload, despite due  
 26 diligence.  
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1 The parties further stipulate that the remaining dates in the Court's Scheduling Order  
2 shall be modified accordingly.

3 Defense counsel apologizes to the Court for any inconvenience caused by this delay.

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5 Respectfully submitted,

6 Dated: December 19, 2014

/s/ Lynn M. Harada for Mary A. Gilg\*  
(\*as authorized via email on 12/19/14)  
MARY A. GILG  
Attorney for Plaintiff

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9  
10 Dated: December 19, 2014

MELINDA L. HAAG  
United States Attorney  
DONNA L. CALVERT  
Regional Chief Counsel, Region IX  
Social Security Administration

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14 By: /s/ Lynn M. Harada  
LYNN M. HARADA  
Special Assistant U.S. Attorney

15  
16 Attorneys for Defendant

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18 ORDER:

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20 APPROVED AND SO ORDERED:

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22 Dated: December 23, 2014

  
\_\_\_\_\_  
THE HONORABLE VINCE CHHABRIA  
United States District Judge

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