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8 Attorneys for Defendant

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 10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA (SAN FRANCISCO)

12 ANITA BROKAW,)	Civil No. 3:15-cv-04313-SK
)	
13 Plaintiff,)	DEFENDANT’S EX PARTE MOTION
14 v.)	AND PROPOSED ORDER TO EXTEND
)	THE TIME FOR DEFENDANT TO FILE
15 CAROLYN W. COLVIN,)	HER ANSWER AND THE CERTIFIED
16 Acting Commissioner of Social Security,)	ADMINISTRATIVE RECORD
)	
17 Defendant.)	
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)	

20 Defendant Carolyn W. Colvin, Acting Commissioner of Social Security, through her
 21 undersigned attorneys, hereby moves to extend the time by 16 days from December 23, 2015, to
 22 January 8, 2016, to file her Answer and the Certified Administrative Record (CAR).

23 There is good cause for this extension because Defendant’s counsel attempted to procure
 24 an additional copy of the CAR to serve Plaintiff. Defendant anticipated that it would be received
 25 today, but has not received it yet. As such, the additional time is needed to obtain and serve
 26 Plaintiff with a copy of the CAR and accommodate the holidays.

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 28 1- Defendant’s Ex Parte Motion and Proposed Order to Extend the Time for Defendant to File
 Her Answer and the Certified Administrative Record

1 Defendant's counsel has not contacted Plaintiff to determine whether she consents to
2 this motion because of the holidays and to file this motion expeditiously.

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4 Respectfully submitted,

5 Dated: December 23, 2015

BENJAMIN B. WAGNER
United States Attorney

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8 By: /s/ Henry L. Chi
HENRY L. CHI
Special Assistant U.S. Attorney

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10 Attorneys for Defendant

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14 ORDER

15 APPROVED AND SO ORDERED.

16 DATED: December 23, 2015

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SALLIE KIM
UNITED STATES MAGISTRATE JUDGE

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2- Defendant's Ex Parte Motion and Proposed Order to Extend the Time for Defendant to File Her Answer and the Certified Administrative Record

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2 **CERTIFICATE OF SERVICE**

3 I, the undersigned, am a citizen of the United States, and am at least eighteen years of age.
4 My business address is 160 Spear Street, Suite 800, San Francisco, California 94105. On
5 December 23, 2015, I caused service of Defendant's Ex Parte Motion and Proposed Order to
6 Extend the Time for Defendant to File Her Answer and the Certified Administrative Record via
7 certified mail, return receipt, and regular mail to the following address:

8 **Anita Brokaw**
9 1874 Fred Jackson Way
10 Richmond, CA 94801

11 I declare under penalty of perjury that the foregoing is true and correct.

12 Dated: December 23, 2015

BENJAMIN B. WAGNER
United States Attorney

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14 By: /s/ Henry L. Chi
15 HENRY L. CHI
16 Special Assistant U.S. Attorney
17 Attorneys for Defendant
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