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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

ILDA KALANI,

Plaintiff,

vs.

CAROLYN W. COLVIN,
Acting Commissioner of Social Security,

Defendant.

) Case No.: 4:13-cv-04591-KAW

)
) EX PARTE MOTION FOR AN
) EXTENSION OF TIME TO RESPOND TO
) PLAINTIFF'S MOTION FOR SUMMARY
) JUDGMENT

IT IS HEREBY REQUESTED by the Defendant through her undersigned attorney,
subject to the approval of the Court, that the Commissioner have a 7-day extension of time up to
and including Friday, May 9, 2014, in which to respond to Plaintiff's Motion for Summary
Judgment. This is Defendant's second request for an extension of time to respond to Plaintiff's
motion. Defense counsel needs the additional time to prepare a response in this matter due to a
heavy workload, despite due diligence. Defendant seeks an extension by motion rather than by
stipulation because Defendant was unable to timely reach Plaintiff's counsel to obtain his
authorization for a stipulation.

1 Defense counsel apologizes to the Court and to Plaintiff's counsel for any inconvenience
2 caused by this delay.

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4 Respectfully submitted,

5 Dated: May 2, 2014

MELINDA L. HAAG
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DONNA L. CALVERT
Acting Regional Chief Counsel, Region IX
Social Security Administration

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8 By: /s/ Lynn M. Harada
9 LYNN M. HARADA
10 Special Assistant U.S. Attorney

11 Attorneys for Defendant

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13 ORDER:

14 APPROVED AND SO ORDERED:

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16 Dated: May 6, 2014

17 Kandis Westmore
18 THE HONORABLE KANDIS A. WESTMORE
19 United States Magistrate Judge
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