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10 Attorneys for Defendant

11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA

12	JOEL DESPAS,)	CIVIL ACTION NO. 4:14-CV-00681-DMR
13	Plaintiff,)	
14	v.)	STIPULATION AND PROPOSED ORDER
15	CAROLYN W. COLVIN, Acting)	FOR A FIRST EXTENSION FOR DEFENDANT
16	Commissioner of Social Security,)	TO FILE CROSS-MOTION FOR SUMMARY
17	Defendant.)	JUDGMENT
)	

18 IT IS HEREBY STIPULATED, by and between the parties, through their respective
 19 counsel of record, that Defendant shall have a first extension of time of 45 days to file her cross-
 20 motion for summary judgment and opposition to Plaintiff’s motion. The current due date is July
 21 22, 2014. The new due date will be September 5, 2014.

22 This is the first continuance sought by Defendant. There is good cause for this request.
 23 Defendant’s counsel has a heavy workload around the time of the due date of Defendant’s brief,
 24 including an Equal Employment Opportunity Commission (EEOC) hearing from July 23-25, for
 25 which she will be on travel and out of town and has to conduct preparation of seven witnesses.
 26 Upon defense counsel’s return after the hearing, she will continue to have a heavy workload,
 27 including two ninth circuit matters, another EEOC matter, at least six other pending district court
 28 cases, and a multi-day training in August. Defendant’s counsel requests additional time to fully

1 review the administrative record and fully research the issues presented by Plaintiff in this case.

2 Counsel for Defendant apologizes to the Court and to Plaintiff for any inconvenience
3 caused by the delay in the filing of Defendant's response to Plaintiff's motion for summary
4 judgment.

5 Respectfully submitted,

6 LAW OFFICES OF HARRY J. BINDER AND
7 CHARLES E. BINDER, PC

8 Dated: July 15, 2014

/s/ Omar O. Ortega

(as authorized via e-mail on 7/15/2014)

Omar O. Ortega

Attorney for Plaintiff

11 MELINDA L. HAAG

United States Attorney

12 Dated: July 15, 2014

By s/ Carolyn B. Chen

CAROLYN B. CHEN

Special Assistant U.S. Attorney

15 Attorneys for Defendant

18 ORDER

19 PURSUANT TO STIPULATION, IT IS SO ORDERED.

21 DATED: July 16, 2014



22 HON. DONNA M. RYU

23 UNITED STATE MAGISTRATE JUDGE