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8 UNITED STATES DISTRICT COURT  
 9 NORTHERN DISTRICT OF CALIFORNIA  
 10

11 ROSANA CASTANEDA  
 12 Plaintiff,  
 13 vs.  
 14 CAROLYN W. COLVIN,  
 15 Acting Commissioner of  
 16 Social Security,  
 17 Defendant.

) CIVIL NO. 4:14-cv-05515-JSW  
 )  
 ) STIPULATION & ~~PROPOSED~~ ORDER  
 ) FOR A 14-DAY EXTENSION FOR  
 ) DEFENDANT TO RESPOND TO  
 ) PLAINTIFF'S MOTION FOR  
 ) SUMMARY JUDGMENT

18  
 19 IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of  
 20 record, that Defendant shall have an extension of time of 14 days to respond to Plaintiff's motion for  
 21 summary judgment. The current due date is September 1, 2015. The new due date will be September  
 22 15, 2015.

23 Defendant respectfully requests this additional time because Defendant's counsel is managing a  
 24 heavy caseload. Defendant's counsel is currently responsible for managing and briefing forty-three  
 25 other matters pending before the District Courts. Counsel is also in the process of completing a ninth  
 26 circuit appellate brief, which must be reviewed by the Office of General Counsel and the United States  
 27

28 Stipulation and ~~Proposed~~ Order for an Extension of Time; 4:14-cv-05515-JSW

1 Department of Justice (DOJ). In addition, counsel is representing the agency in a federal employment  
2 discrimination case and is in the process of gathering and serving documents for discovery.

3 This request is made in good faith with no intention to unduly delay the proceedings.

4 The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

5 Counsel apologizes to the Court for any inconvenience caused by this delay.

6  
7 Respectfully submitted,

8  
9 Dated: August 28, 2015

/s/ Barbara Mann by Chantal R. Jenkins\*  
As authorized via email on August 28, 2015  
Barbara Mann  
Attorney for Plaintiff

12 Respectfully submitted,

13 MELINDA L. HAAG  
14 United States Attorney

15 Dated: August 28, 2015

/s/ Chantal R. Jenkins  
Chantal R. Jenkins  
Special Assistant United States Attorney

18  
19  
20 ORDER

21 PURSUANT TO STIPULATION, IT IS SO ORDERED.

22 DATED: August 28, 2015

  
23 HON. JEFFREY S. WHITE  
24 UNITED STATE DISTRICT JUDGE