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Attorneys for Defendant

9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA

12 REGINA L. HARRIS,

13 Plaintiff,

14 vs.

15 CAROLYN W. COLVIN,
 16 Acting Commissioner of Social Security,

17 Defendant.

) CIVIL NO. 4:15-CV-01312-YGR

)
)
) STIPULATION AND ~~PROPOSED~~
) ORDER FOR SECOND EXTENSION
) OF TIME FOR DEFENDANT TO FILE
) CROSS-MOTION FOR SUMMARY
) JUDGMENT AND OPPOSITION TO
) PLAINTIFF'S MOTION FOR
) SUMMARY JUDGMENT

) ***AS MODIFIED BY THE COURT***

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 21 IT IS HEREBY STIPULATED, by and between the parties, that Defendant shall have an extension
 22 of time of 30 days to file a Cross-Motion for Summary Judgment and Opposition to Plaintiff's Motion
 23 for Summary Judgment. This is Defendant's second request for an extension of time to respond to
 24 Plaintiff's motion. Assistant Regional Counsel In Seon Jeong was assigned to this case and has
 25 diligently attempted to complete Defendant's responsive brief in a timely matter. However, the
 26 undersigned counsel for Defendant seeks this extension due to the press of workload including a high
 27

28 Stip. & Prop. Order for Extension, 4:15-CV-01312-YGR

1 volume of other disability matters. Counsel apologizes to the Court for any inconvenience caused by
2 this delay.

3 The new due date for Defendant's Cross-Motion and Opposition will be March 19, 2016. The
4 parties further stipulate that the Court's Scheduling Order shall be modified accordingly.
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7 Respectfully submitted,

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9 Dated: February 17, 2016

10 By: /s/ Donald H. Medearis
DONALD H. MEDEARIS
11 (as authorized via-email on February 17, 2016)

12 ~~MELINDA L. HAAG~~ BRIAN STRETCH
United States Attorney

13 Dated: February 17, 2016

14 By: /s/ Jacob M. Mikow
JACOB M. MIKOW
15 Special Assistant United States Attorney
Attorneys for Defendant

16 Of Counsel:

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18 IN SEON JEONG
Assistant Regional Counsel
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20
21 ORDER

22 PURSUANT TO STIPULATION, IT IS SO ORDERED. However, as this is the second request for
23 workload related issues, no further extensions will be granted absent extraordinary circumstances.

24 Counsel is instructed to amend his template to reflect the current United States Attorney.

25 DATED: February 22, 2016

26 
HON. YVONNE GONZALEZ ROGERS
27 UNITED STATE DISTRICT COURT JUDGE

28 Stip. & Prop. Order for Extension, 4:15-CV-01312-YGR