

E-Filed: January 7, 2014

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5 Attorneys for Plaintiff

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 7 **IN THE UNITED STATES DISTRICT COURT**
 8 **NORTHERN DISTRICT OF CALIFORNIA**
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10 **JANET LOTHIAN**
 11 **xxx-xx-7174**

Case No. 13-cv-02997 HRL

12)
13)
14 **Plaintiff,**

12) ~~**PROPOSED**~~
 13) **STIPULATION AND ORDER**
 14) **EXTENDING PLAINTIFF’S TIME TO**
 15) **FILE MEMORANDUM IN SUPPORT**
 16) **OF SUMMARY JUDGMENT AND**
 17) **DECLARATION**

15 v.

16 **COMMISSIONER OF SSA**
 17 **Defendant.**

18)
 19)
 20)
 21 IT IS HEREBY STIPULATED by and between the parties, through their attorneys, and with
 22 the permission of the Court as evidenced below, that the Plaintiff’s time to file the summary
 23 judgment in this case is hereby extended from January 6, 2014, to January 14, 2014, with all other
 24 due dates adjusted accordingly. This short additional extension of time is required due plaintiff’s
 25 counsel’s impacted briefing schedule and need to complete an older brief due the same day. See,
 26 Declaration of Bess M. Brewer set forth below.
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 28

1 Dated: January 6, 2014

/s/Bess M. Brewer
BESS M. BREWER
Attorney at Law

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Attorney for Plaintiff
Benjamin B. Wagner
United States Attorney

5 Dated: January 6, 2014

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/s/ Patrick Snyder
PATRICK SNYDER

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Special Assistant U.S. Attorney
Attorney for Defendant

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DECLARATION OF BESS M. BREWER

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DECLARATION OF BESS M. BREWER

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I, Bess M. Brewer, Declare:

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1. I represent the plaintiff in the above referenced case pending in this court and submit this declaration in support of plaintiff's stipulated request for an extension of time to file his motion for summary judgment.

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2. Due to my briefing schedule, I need an additional week to complete Ms. Lothian's Motion for Summary Judgment and Memorandum. At the time of the first request, I felt I would be able to complete both briefs scheduled for January 6, 2014. Unfortunately, I am unable to do so and need additional time to complete Ms. Lothian's MSJ.

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3. This short additional extension of time to file Ms. Lothian's summary judgment will not have an appreciable effect on the briefing of this case.

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I declare under the penalty of perjury that the foregoing is true and correct to the best of my knowledge, and that this declaration was executed on January 6, 2014, in Sacramento, California.

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/s/ Bess M. Brewer
BESS M. BREWER

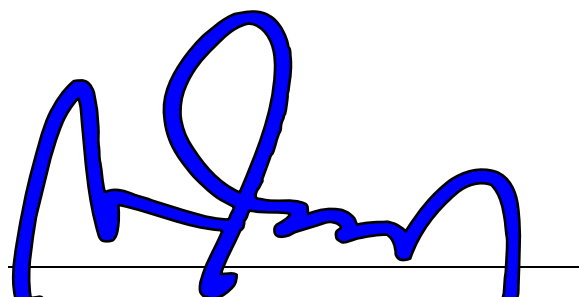
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ORDER

APPROVED AND SO ORDERED.

DATED: January 7, 2014



HONORABLE HOWARD R. LLOYD