

1 BENJAMIN B. WAGNER
United States Attorney
2 DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
3 Social Security Administration
4 HEATHER M. MOSS, DCBN 995773
Special Assistant United States Attorney
5 160 Spear Street, Suite 800
San Francisco, CA 94105
6 Phone: 415-977-8826
7 Fax: 415-744-0134
Email: heather.moss@ssa.gov

8
9 Attorneys for Defendant

10 **UNITED STATES DISTRICT COURT**
11 **EASTERN DISTRICT OF CALIFORNIA**

12 Mark Steven Ondracek,) Case No.: 1:15-cv-01308-SKO
13)
Plaintiff,) **STIPULATION AND ORDER**
14) **FOR AN EXTENSION OF TIME**
vs.)
15)
16 CAROLYN W. COLVIN, Acting)
Commissioner of Social Security,)
17)
Defendant.)

18
19 Defendant CAROLYN W. COLVIN, Acting Commissioner of Social Security, through
20 her counsel of record, hereby moves the Court to extend the time by 60 days from September 7,
21 2016, to November 7, 2016, for Defendant to file her opposition, and to extend the remaining
22 case deadlines accordingly. There is good cause for extending the case deadlines because the
23 undersigned agency counsel is leaving the Social Security Administration. The agency must
24 reassign the case to another agency counsel who will need additional time to become familiar
25 with the facts and issues of the case before briefing. Counsel apologizes to the Court and
26 Plaintiff for any inconvenience that this may cause.

27 //

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Respectfully submitted,

Dated: August 31, 2016

BENJAMIN B. WAGNER
United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

By /s/ Heather M. Moss
HEATHER M. MOSS
Special Assistant U.S. Attorney
Attorneys for Defendant

Date: August 31, 2016

MELISSA NEWEL
Newel Law

/s/ Melissa Newel*
MELISSA NEWEL
[*By email authorization on August 30, 2016]
Attorney for Plaintiff

ORDER

Based on the above stipulation of the parties, IT IS HEREBY ORDERED that:

1. Defendant is granted an extension of time, up and including November 7, 2016, to file an opposition brief; and
2. Plaintiff may file an optional reply brief on or before November 28, 2016.

IT IS SO ORDERED.

Dated: September 1, 2016

/s/ Sheila H. Oberto
UNITED STATES MAGISTRATE JUDGE