

PHILLIP A. TALBERT  
Acting United States Attorney  
DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX  
Social Security Administration  
CAROLYN B. CHEN, CSBN 256628  
Special Assistant United States Attorney  
160 Spear Street, Suite 800  
San Francisco, California 94105  
Telephone: (415) 977-8956  
Facsimile: (415) 744-0134  
E-Mail: Carolyn.Chen@ssa.gov  
Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION**

KONG PENG LEE,	)	Case No.: 1:15-cv-01859-BAM
	)	
Plaintiff,	)	
	)	STIPULATION AND ORDER FOR AN
vs.	)	EXTENSION OF TIME OF 45 DAYS FOR
CAROLYN W. COLVIN,	)	DEFENDANT'S RESPONSE TO
Acting Commissioner of Social Security,	)	PLAINTIFF'S MOTION FOR SUMMARY
	)	JUDGMENT
	)	
Defendant.	)	

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that Defendant shall have an extension of time of an additional 45 days to respond to Plaintiff's motion for summary judgment. The current due date is October 31, 2016. The new due date will be December 15, 2016.

There is good cause for this request. Defendant is seeking this extension due to an emergency and workload issues. Defendant's counsel had a medical emergency on Monday, October 24, 2016, and had and will continue to take some leave.

Defendant is requesting additional time up to and including December 15, 2016, to fully review the record and research the issues presented by Plaintiff's motion for summary judgment. This request is made in good faith with no intention to unduly delay the proceedings.

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

3 Respectfully submitted,

4 Date: October 31, 2016

PENA & BROMBERG, ATTORNEYS AT LAW

5 s/ Jonathan O. Pena by C.Chen\*

6 (As authorized by e-mail on 10/31/2016)

7 JONATHAN O. PENA

Attorneys for Plaintiff

8 Date: October 31, 2016

9 PHILLIP A. TALBERT

Acting United States Attorney

10 By s/ Carolyn B. Chen

11 CAROLYN B. CHEN

12 Special Assistant U. S. Attorney

13 Attorneys for Defendant

14 **ORDER**

15  
16 Based upon the stipulation of the parties, and for cause shown, IT IS HEREBY  
17 ORDERED, that Defendant shall have a 45-day extension, or until December 15, 2016, in which  
18 to file an Opposition to Plaintiff's Opening Brief; and that all other deadlines set forth in the  
19 Case Management Order shall be extended accordingly.

20 IT IS SO ORDERED.

21  
22 Dated: November 1, 2016

/s/ Barbara A. McAuliffe  
23 UNITED STATES MAGISTRATE JUDGE