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9 **UNITED STATES DISTRICT COURT**
10 **EASTERN DISTRICT OF CALIFORNIA**
11 **SACRAMENTO DIVISION**

13 KONG PENG LEE,)	Case No.: 1:15-cv-01859-BAM
14 Plaintiff,)	
15 vs.)	STIPULATION FOR AN EXTENSION OF
16 CAROLYN W. COLVIN,)	TIME OF 8 DAYS FOR DEFENDANT'S
Acting Commissioner of Social Security,)	RESPONSE TO PLAINTIFF'S MOTION
17 Defendant.)	FOR SUMMARY JUDGMENT
18)	

19 IT IS HEREBY STIPULATED, by and between the parties, through their respective
20 counsel of record, that Defendant shall have an extension of time of an additional 8 days to
21 respond to Plaintiff's motion for summary judgment. The current due date is December 15,
22 2016. The new due date will be December 23, 2016.

23 There is good cause for this request. Defendant is seeking this extension due to a car
24 accident that Defendant's counsel was in and will be taking leave to receive treatment and
25 recover.

26 Defendant is requesting additional time up to and including December 23, 2016, to
27 complete Defendant's response to Plaintiff's motion for summary judgment. This request is
28 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: December 15, 2016

PENA & BROMBERG, ATTORNEYS AT LAW

5 s/ Jonathan O. Pena by C.Chen*
6 (As authorized by e-mail on 12/15/2016)
7 JONATHAN O. PENA
8 Attorneys for Plaintiff

9 Date: December 15, 2016

PHILLIP A. TALBERT
United States Attorney

10 By s/ Carolyn B. Chen
11 CAROLYN B. CHEN
12 Special Assistant U. S. Attorney

13 Attorneys for Defendant

14
15 ORDER

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17 Based upon the stipulation of the parties, and for cause shown, IT IS HEREBY
18 ORDERED that Defendant shall have an 8-day extension of time, or until December 23, 2016, in
19 which to file an Opposition to Plaintiff's Opening Brief; and that all other deadlines set forth in
20 the Court's Scheduling Order shall be modified accordingly.

21
22 IT IS SO ORDERED.

23 Dated: December 15, 2016

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