

1 PHILLIP A. TALBERT
United States Attorney
2 DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
3 Social Security Administration
4 TIMOTHY R. BOLIN, CSBN 259511
Special Assistant United States Attorney
5 Social Security Administration
Office of the General Counsel
6 160 Spear St Ste 800
7 San Francisco, CA 94105
Telephone: (415) 977-8982
8 Email: timothy.bolin@ssa.gov
Attorneys for Defendant

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

12 TOU VUE,) Case No.: 1:16-cv-00155-BAM
13)
Plaintiff,) STIPULATION AND ORDER FOR AN
14) EXTENSION OF TIME
vs.)
15)
16 CAROLYN W. COLVIN,)
Acting Commissioner of Social Security,)
17)
Defendant.)

18
19 IT IS HEREBY STIPULATED, by and between the parties, through their respective
20 counsel of record, that Defendant's time for responding to Plaintiff's Motion for Summary
21 Judgment be extended for 45 days from January 20, 2017 to March 7, 2017. This is Defendant's
22 first request for an extension of time to respond to Plaintiff's motion.

23
24 Defendant requests this extension due to her attorney's inordinately heavy caseload in
25 January 2017 through February 2017, including an appellate brief before the United States Court
26 of Appeals for the Ninth Circuit and 30 other District Court cases, in a variety of stages, seven of
27 which require imminent briefing in the next three weeks. Defendant's counsel is also assisting
28 an active employment case before the Equal Employment Opportunity Commission that is in the

1 midst of the discovery process and requires responding to Complainant's Request for
2 Interrogatories, Admission and Production of Documents by January 23, 2017. Defendant's
3 counsel respectfully requests this additional time to respond to Plaintiff's arguments.

4 The parties further stipulate that all subsequent deadlines set forth in the Court's
5 Scheduling Order shall be extended accordingly.

6 The parties stipulate in good faith, with no intent to prolong proceedings unduly.

7 Dated: January 17, 2017
8 Respectfully submitted,
9 /s/ Kelsey Brown*
10 (* As authorized via email on January 17, 2017)
11 KELSEY BROWN

12 Dated: January 17, 2017
13 Attorney for Plaintiff
14 PHILLIP A. TALBERT
15 United States Attorney
16 DEBORAH LEE STACHEL
17 Regional Chief Counsel, Region IX
18 Social Security Administration

19 By: /s/ Timothy R. Bolin
20 TIMOTHY R. BOLIN
21 Special Assistant United States Attorney
22 Attorneys for Defendant

23 ORDER

24 Based upon the stipulation of the parties, and for cause shown, IT IS HEREBY
25 ORDERED, that Defendant shall have a 45-day extension, or until March 7, 2017, in which to
26 file an Opposition to Plaintiff's Opening Brief; and that all other deadlines set forth in the Case
27 Management Order shall be extended accordingly.

28 IT IS SO ORDERED.

Dated: January 19, 2017

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE