

1 PHILLIP A. TALBERT  
United States Attorney  
2 DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX  
3 Social Security Administration  
4 BEATRICE NA, CSBN 303390  
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) 977-8967  
8 Facsimile: (415) 744-0134  
E-mail: beatrice.na@ssa.gov  
9 Attorneys for Defendant

10 **UNITED STATES DISTRICT COURT**  
11 **EASTERN DISTRICT OF CALIFORNIA**  
12 **FRESNO DIVISION**

14 BETTY JEAN PARKER, ) Case No. 1:16-cv-00176-EPG  
15 Plaintiff, ) JOINT STIPULATION AND ORDER FOR  
16 vs. ) AN EXTENSION OF TIME  
17 ) (ECF No. 23)  
18 NANCY A. BERRYHILL, )  
Acting Commissioner of Social Security, )  
19 Defendant. )

20  
21 IT IS HEREBY STIPULATED, by and between the parties, through their respective  
22 counsel of record, that Defendant's time for responding to Plaintiff's Motion for Summary  
23 Judgment be extended for 30 days from March 24, 2017 to April 24, 2017 (April 23, 2017 is a  
24 Sunday). This is Defendant's second request for an extension of time to respond to Plaintiff's  
25 Motion for Summary Judgment.

26 Defendant requests this extension due to her counsel's heavy workload in February 2017  
27 through April 2017. Since Defendant's counsel was reassigned to this case on February 1, 2017,  
28 Defendant's counsel was responsible for conducting discovery in a personnel-related litigation

1 pending before the Equal Employment Opportunity Commission (EEOC), which required review  
2 of Complainant's responses to agency's discovery requests and numerous documents in order to  
3 investigate the relevant facts and to assist preparation for deposition of Complainant on March  
4 10, 2017. After the deposition, Defendant's counsel requested 6-week extension to conduct  
5 further discovery, and is currently preparing to conduct deposition of multiple witnesses in April  
6 2017. Defendant's counsel was also responsible for two appellate briefs for a Social Security  
7 case in the United States Court of Appeals for the Ninth Circuit and a bankruptcy case before the  
8 United States Bankruptcy Court for the Central District of California, in addition to at least 36  
9 district court cases in a variety of stages.

10 Defendant's counsel respectfully requests this additional time to expend the necessary  
11 time to review the 1,223-page record and to evaluate the issues Plaintiff raises, and to submit  
12 Defendant's response to Plaintiff's motion for review by this Court.

13 The parties further stipulate that all subsequent deadlines set forth in the Court's  
14 Procedural Order for Social Security Review Actions shall be extended accordingly.

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

16 Respectfully submitted,

17 Dated: March 23, 2017

/s/ Melissa Newel\*

(\* As authorized via email on March 23, 2017)

MELISSA NEWEL

19 Attorney for Plaintiff

20  
21  
22 Dated: March 23, 2017

PHILLIP A. TALBERT

United States Attorney

23  
24 By: /s/ Beatrice Na

BEATRICE NA

Special Assistant United States Attorney

26 Attorneys for Defendant  
27  
28

1 **ORDER**

2 Based on the above stipulation and good cause appearing therein, the Court grants  
3 Defendant an extension of time to file her opposition to Plaintiff's opening brief. Defendant's  
4 opposition brief shall be filed no later than **April 24, 2017**. Plaintiff may file her reply brief no  
5 later than **May 9, 2017**.

6  
7 IT IS SO ORDERED.

8 Dated: **March 27, 2017**

9 */s/ Eric P. Groj*  
10 UNITED STATES MAGISTRATE JUDGE  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28