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8 Attorneys for Defendant

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

12 ROBERT ODOM,) Case No: 1:16-CV-00270-EPG
13)
Plaintiff,) UNOPPOSED MOTION FOR EXTENSION OF
14) TIME BY DEFENDANT TO FILE HER
vs.) RESPONSE TO SETTLEMENT LETTER
15) (DEFENDANT’S FIRST REQUEST) AND
16) ORDER
CAROLYN W. COLVIIN, Acting Commissioner)
17 of the Social Security Administration,)
Defendant.)

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19 Pursuant to Fed. R. Civ. P. 6(b), Carolyn W. Colvin, Acting Commissioner of Social
20 Security (“Defendant”) hereby moves for a seven-day extension of time from September 20, 2016,
21 through and including September 27, 2016.

22 Defendant respectfully requests the Court extend the time for Defendant to file Response
23 to Plaintiff’s Settlement Letter Request (hereinafter “Defendant’s response”). This is the first
24 extension sought by Defendant.

25 There is good cause for this request. I have requested settlement authority from my client
26 and expect a response should be forthcoming by the original response date of September 20, 2016.
27 Thereafter, I will need time to draft a stipulation and proposed order and discuss the terms of the
stipulation with Plaintiff’s counsel. I anticipate this will take no longer than seven days.
28 Stipulation and Order for Extension of Time

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This request is made in good faith with no intention to unduly delay the proceedings.

Counsel for Defendant conferred with Plaintiff’s counsel on September 9, 2016, who has no opposition to this motion. The undersigned apologizes to the Court and opposing counsel for any inconvenience incurred because of this request.

Respectfully submitted,

Dated: September 9, 2016

PHILLIP TALBERT
United States Attorney
DEBORAH LEE STACHEL,
Regional Chief Counsel, Region IX
Social Security Administration

By: /s/ Richard M. Rodriguez
RICHARD M. RODRIGUEZ
Special Assistant U.S. Attorney

Attorneys for Defendant

Dated: September 9, 2016

/s/ Cyrus Safa, Esq.
As authorized by email
CYRUS SAFA, ESQ.
Attorney for Plaintiff

ORDER

Pursuant to the parties’ stipulation, Defendant shall file its response to Plaintiff’s confidential letter statement no later than **September 27, 2016**. All other dates in the scheduling order issued on March 2, 2016 (Doc. 5) are modified accordingly.

IT IS SO ORDERED.

Dated: **September 12, 2016**

/s/ Eric P. Shoj
UNITED STATES MAGISTRATE JUDGE

Stipulation and Order for Extension of Time