

1 BENJAMIN B. WAGNER
2 United States Attorney
3 DEBORAH LEE STACHEL
4 Regional Chief Counsel, Region IX
5 Social Security Administration
6 ESTHER KIM
7 Special Assistant United States Attorney
8 160 Spear Street, Suite 800
9 San Francisco, California 94105
10 Telephone: (415) 977-8922
11 Facsimile: (415) 744-0134
12 E-Mail: Esther.H.Kim@ssa.gov

13 Attorneys for Defendant

14 **UNITED STATES DISTRICT COURT**
15 **EASTERN DISTRICT OF CALIFORNIA**
16 **SACRAMENTO DIVISION**

17 LUERETHER DE JEAN,
18 Plaintiff,

19 vs.

20 NANCY A. BERRYHILL, Acting
21 Commissioner of Social Security,

22 Defendant.

) Case No.: 1:16-cv-00319-EPG

) **STIPULATION FOR EXTENSION**

23 IT IS HEREBY STIPULATED by and between the parties, through their
24 respective undersigned attorneys, and with the permission of the Court as evidenced
25 below, that the Defendant has 45 additional days to respond to Plaintiff's Motion for
26 Summary Judgment. Defendant's Counsel's colleague requests this extension on
27
28

1 Defendant's Counsel's behalf due to an unexpected personal emergency requiring
2 Defendant's Counsel's absence from the office for several weeks.
3

4 This is the Commissioner's first extension request.

5 Respectfully submitted,

6
7 Dated: September 9, 2017

BENJAMIN B. WAGNER
United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

8
9
10
11 By: /s/ Esther Kim
12 Esther Kim
13 Special Assistant U.S. Attorney
14 Attorneys for Defendant

15
16 Dated: September 11, 2017

/s/ Stephen G. Rosales
Stephen G. Rosales
(as authorized via email by Lawrence Rohlfing)
Attorney at Law
Attorney for Plaintiff

17
18
19
20
21
22
23
24
25
26
27
28

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

Based on the above stipulation and good cause having been shown therein, Defendant's requests for a 45-day extension to respond to Plaintiff's Motion for Summary Judgment is granted.

IT IS SO ORDERED.

Dated: September 12, 2017

/s/ Eric P. Gray
UNITED STATES MAGISTRATE JUDGE