

1 PHILLIP A. TALBERT  
 Acting United States Attorney  
 2 DEBORAH LEE STACHEL  
 Acting Regional Chief Counsel, Region IX  
 3 Social Security Administration  
 4 MARCELO ILLARMO (MABN 670079)  
 Special Assistant United States Attorney  
 5 160 Spear Street, Suite 800  
 San Francisco, California 94105  
 6 Telephone: (415) 977-8944  
 7 Facsimile: (415) 744-0134  
 E-Mail: Marcelo.Illarmo@ssa.gov

8 Attorneys for Defendant

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

12 SHERRI RENEE TELNAS	)	Case No.: 1:16-cv-00583-EPG
	)	
14 Plaintiff,	)	STIPULATION AND ORDER FOR AN
	)	EXTENSION OF TIME
15 v.	)	
16 CAROLYN W. COLVIN,	)	
Acting Commissioner of Social Security,	)	
	)	
17 Defendant.	)	

18 \_\_\_\_\_  
 19  
 20 IT IS HEREBY STIPULATED, by and between the parties, through their respective  
 21 counsel of record, that the time for responding to Plaintiff’s Complaint will be extended by 33  
 22 days, from September 8, 2016 until October 11, 2016.

23 This is Defendant’s first request for an extension of time to respond to Plaintiff’s motion.  
 24 Defendant respectfully requests this additional time because additional time is needed to prepare  
 25 the administrative record.

26 The parties further stipulate that the Court’s Scheduling Order (Dkt No. 5-1) shall be  
 27 modified accordingly:  
 28

- Within thirty (30) days after service of the administrative record, on or before November 10, 2016, appellant shall serve on respondent a letter brief outlining the reasons why he/she contends that a remand is warranted
- Within thirty–five (35) days after service of appellant's letter brief, on or before December 15, 2016, respondent shall serve a response to appellant's letter brief on appellant.
- In the event the parties stipulate to a remand to the Commissioner, the stipulation shall be filed with the Court WITHIN fifteen (15) days after respondent serves his response on appellant, on or before December 30, 2016.
- In the event respondent does not agree to a remand, within thirty (30) days of service of respondent's response, on or before January 16, 2017, appellant shall file and serve an opening brief with the court and on respondent.
- Respondent's responsive brief shall be filed with the court and served on appellant within thirty (30) days after service of appellant's opening brief, on or before February 15, 2017.
- Appellant's reply brief shall be filed with the court and served on respondent within fifteen (15) days after service of respondent's brief, on or before March 2, 2017.

Respectfully submitted,

Dated: September 8, 2016

/s/ Steven G. Rosales  
(\*as authorized via e-mail on 09/06/2016)  
STEVEN G. ROSALES  
Attorney for Plaintiff

Dated: September 8, 2016

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

By: /s/ Marcelo Illarmo  
MARCELO ILLARMO  
Special Assistant United States Attorney

Attorneys for Defendant

1 ORDER

2 The Court approves the above parties' stipulation, however, in addition to the listed  
3 deadline, the Commissioner shall file the administrative record **no later than October 11, 2016.**

4  
5 IT IS SO ORDERED.

6 Dated: September 9, 2016

7 /s/ Eric P. Groj  
8 UNITED STATES MAGISTRATE JUDGE