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

12
13 IRMA PACHECO BANUELOS) Case No.: 1:16-CV-00687-EPG
14 Plaintiff,)
15 vs.) **JOINT STIPULATION AND ORDER FOR**
16 NANCY A. BERRYHILL¹,) **EXTENSION OF TIME FOR**
Acting Commissioner of Social Security,) **DEFENDANT TO RESPOND TO**
17 Defendant.) **PLAINTIFF'S MOTION FOR SUMMARY**
18) **JUDGMENT**

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20 IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record,
21 that the time for responding to Plaintiff's Motion for Summary Judgment be extended from
22 February 6, 2017, to March 8, 2017 due to current workload demands. This is Defendant's first
23 request for extension. Good cause exists as counsel for Defendant has four other pending
24 responses due at or around the same time and a Ninth Circuit responsive brief due to the U.S.
25 Attorney's Office shortly thereafter. Defendant respectfully requests additional time to respond

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27 ¹ Nancy A. Berryhill is now the Acting Commissioner of Social Security. Pursuant to Rule 25(d) of the Federal
28 Rules of Civil Procedure, Nancy A. Berryhill should be substituted for Acting Commissioner Carolyn W. Colvin as
the defendant in this suit. No further action needs to be taken to continue this suit by reason of the last sentence of
section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).
Joint Stipulation for Extension of Time, Case No. 1:16-CV-00687-EPG

1 to Plaintiff's Motion for Summary Judgment in order to adequately research and analyze the
2 issues presented by Plaintiff. Defendant makes this request in good faith with no intention to
3 unduly delay the proceedings.

4 The parties further stipulate that the Court's Scheduling Order shall be modified
5 accordingly.

6 Respectfully submitted,

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8 Dated: January 25, 2017

/s/ *Cyrus Safa
(*as authorized by email on January 25, 2017)
CYRUS SAFA
Attorney for Plaintiff

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11 Dated: January 25, 2017

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16 By /s/ Roya Massoumi
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18 Of Counsel:
TINA L. NAICKER
Assistant Regional Counsel

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1 **ORDER**

2 For the reasons stated in the stipulation, good cause appears to extend the time for
3 responding to Plaintiff's opening brief from February 6, 2017, to March 8, 2017.

4
5 IT IS SO ORDERED.

6 Dated: **January 26, 2017**

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