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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. BERRYHILL,) **EXTENSION OF TIME FOR**
Acting Commissioner of Social Security,) **DEFENDANT TO RESPOND TO**
17 Defendant.) **PLAINTIFF'S MOTION FOR SUMMARY**
18) **JUDGMENT**

19
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 March 8, 2017, to April 7, 2017 due to current workload demands. This is Defendant's second
23 request for extension. Good cause exists as counsel for Defendant has a Ninth Circuit responsive
24 brief due to the U.S. Attorney's Office on or around the same time as the current deadline. In
25 addition, counsel for Defendant needs additional time to complete the agency's review process
26 for new attorneys and due to scheduling conflicts with anticipated leave from March 10-21,
27 2017, counsel will not be able to complete the review process, which requires additional levels of
28 review. Defendant respectfully requests additional time to respond to Plaintiff's Motion for
Joint Stipulation for Extension of Time, Case No. 1:16-CV-00687-EPG

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

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

5 Respectfully submitted,

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7 Dated: February 28, 2017

/s/ *Cyrus Safa
(*as authorized by email on February 28, 2017)
CYRUS SAFA
Attorney for Plaintiff

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11 Dated: February 28, 2017

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15 By /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant U.S. Attorney

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17 Attorneys for Defendant

18 **ORDER**

19 Based on the above stipulation and good cause appearing therein, the Court grants Defendant
20 an extension of time to file her opposition to Plaintiff's opening brief. Defendant's opposition brief
21 shall be filed no later than **April 7, 2017**. Plaintiff may file her reply brief no later than **April 24,**
22 **2017.**

23
24 IT IS SO ORDERED.

25
26 Dated: **March 2, 2017**

/s/ Eric P. Grosjean
UNITED STATES MAGISTRATE JUDGE