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

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13 IRMA PACHECO BANUELOS,) Case No.: 1:16-CV-00687-EPG
14 Plaintiff,) **JOINT STIPULATION AND ORDER FOR**
15 vs.) **EXTENSION OF TIME FOR**
16 NANCY A. BERRYHILL,) **DEFENDANT TO RESPOND TO**
Acting Commissioner of Social Security,) **PLAINTIFF'S MOTION FOR SUMMARY**
17 Defendant.) **JUDGMENT**
18)
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 for an
22 additional three days from April 7, 2017 to **April 10, 2017**. This is Defendant's third request for
23 extension. Good cause exists as counsel for Defendant was unexpectedly out of the office last
24 week and anticipates taking further leave this week, including on April 7, 2017, the current
25 deadline for Defendant's response, in order to take her mother to the hospital for an urgent
26 medical issue. Counsel for Defendant is the primary caregiver for her elderly and disabled
27 mother. Due to the unexpected absences, counsel needs additional time to adequately research,
28 analyze, and respond to the issues raised in Plaintiff's Motion for Summary Judgment.

1 Defendant makes this request in good faith with no intention to unduly delay the
2 proceedings. Defendant will diligently make the new deadline. The parties further stipulate that
3 the Court's Scheduling Order shall be modified accordingly.

4 Respectfully submitted,

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6 Dated: April 4, 2017

/s/ *Cyrus Safa
(*as authorized by email on April 4, 2017)
CYRUS SAFA
Attorney for Plaintiff

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10 Dated: April 4, 2017

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14 By /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant U.S. Attorney
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16 Attorneys for Defendant
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ORDER

For the reasons provided in the parties' stipulation, good cause appears for an extension of time for responding to Plaintiff's Motion for Summary Judgment for until April 10, 2017. All other deadlines in the scheduling order are modified accordingly.

IT IS SO ORDERED.

Dated: April 5, 2017

/s/ Eric P. Grogan
UNITED STATES MAGISTRATE JUDGE