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8 Attorneys for Defendant

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

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13 DEBORAH ANN BISHOP ) Case No.: 1:16-CV-00741-EPG  
14 Plaintiff, ) **JOINT STIPULATION AND ORDER FOR**  
15 vs. ) **EXTENSION OF TIME FOR**  
16 CAROLYN W. COLVIN, ) **DEFENDANT TO RESPOND TO**  
Acting Commissioner of Social Security, ) **PLAINTIFF'S OPENING BRIEF**  
17 Defendant. )  
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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 Opening Brief be extended for approximately forty-five  
22 (45) days from February 16, 2017, to **April 3, 2017** due to current workload demands. This is  
23 Defendant's first request for extension. Good cause exists as counsel for Defendant has  
24 numerous pending responses due at or around the same time and a Ninth Circuit responsive brief  
25 due. Additional time is also required because counsel for Defendant will not be able to complete  
26 the review process for new attorneys due to scheduling conflicts and upcoming scheduled leave  
27 of reviewing counsel for Defendant from March 10, 2017 to March 21, 2017. As such,  
28 Defendant respectfully requests additional time to respond to Plaintiff's Opening Brief in order

1 to adequately research and analyze the issues presented by Plaintiff. Defendant makes this  
2 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 10, 2017

/s/ \*Young Cho  
(\*as authorized by email on February 9, 2017)  
YOUNG CHO  
Attorney for Plaintiff

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9  
10 Dated: February 10, 2017

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15 By /s/ Tina Naicker  
Tina Naicker  
Special Assistant U.S. Attorney  
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17 Attorneys for Defendant  
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**ORDER**

For the reasons provided in the parties' stipulation, good cause appears for an extension of time from February 16, 2017, to April 3, 2017 for Defendant to respond to Plaintiff's Opening Brief. The Court's Scheduling Order is modified accordingly.

IT IS SO ORDERED.

Dated: February 14, 2017

/s/ Eric P. Groj  
UNITED STATES MAGISTRATE JUDGE