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8 Attorneys for Defendant

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

12
13 DEBORAH ANN BISHOP

14 Plaintiff,

15 vs.

16 CAROLYN W. COLVIN,
Acting Commissioner of Social Security,

17 Defendant.
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) Case No.: 1:16-CV-00741-EPG

) **JOINT STIPULATION AND ORDER FOR**
) **EXTENSION OF TIME FOR**
) **DEFENDANT TO RESPOND TO**
) **PLAINTIFF'S OPENING BRIEF**

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20 IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record,
21 that the time for Defendant to respond to Plaintiff's Opening Brief be extended for 30 days from
22 the current deadline of April 3, 2017 to **May 3, 2017**. This is Defendant's second request for
23 extension. Good cause exists to grant Defendant's request for extension. Additional time is
24 required as counsel for Defendant has over 45+ active matters, of which five dispositive motions
25 are required on or before the current deadline, including Defendant's opening brief before the
26 Ninth Circuit. Due to scheduling conflicts, counsel for Defendant needs additional time to
27 complete the agency's review process and U.S. Attorneys' process for the Ninth Circuit brief.
28 Additionally, counsel for Defendant was recently assigned a document review matter that

1 requires immediate attention. As such, Defendant respectfully requests additional time to
2 respond to Plaintiff's Opening Brief in order to adequately research, analyze and respond the
3 issues presented by Plaintiff. Defendant makes this request in good faith with no intention to
4 unduly delay the proceedings. Defendant will diligently meet the next deadline. The parties
5 further stipulate that the Court's Scheduling Order shall be modified accordingly.

6 Respectfully submitted,

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8 Dated: March 30, 2017

/s/ *Young Cho
(*as authorized by email on March 30, 2017)
YOUNG CHO
Attorney for Plaintiff

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12 Dated: March 30, 2017

PHILLIP A. TALBERT
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DEBORAH LEE STACHEL
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16 By /s/ Tina Naicker
Tina Naicker
Special Assistant U.S. Attorney

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18 Attorneys for Defendant
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1 **ORDER**

2 For the reasons provided in the parties' stipulation, good cause appears to extend the time
3 for Defendant to respond to Plaintiff's Opening Brief be extended for 30 days from the current
4 deadline of April 3, 2017 to May 3, 2017. All other deadlines are extended accordingly.
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6 IT IS SO ORDERED.

7 Dated: April 3, 2017

8 /s/ Eric P. Gray
9 UNITED STATES MAGISTRATE JUDGE
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