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

12
13 JENYNE THORNTON,) Case No.: 1:16-CV-00816-GSA
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**

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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 for thirty
22 days from June 19, 2017 to **July 19, 2017**. This is Defendant's first request for extension.
23 Good cause exists to grant Defendant's request for extension. Additional time is required as
24 counsel for Defendant was out of the office on sick leave last week and has been suffering from
25 ongoing debilitating migraines. As a result, Counsel was not able to adequately research and
26 review the transcript in time to adequately respond to Plaintiff's Motion for Summary Judgment.
27 In addition, good cause exists as due to current workload demands and shortened staff, counsel
28 has a total of four dispositive motions to respond to this week, as well as two + dispositive
JS for Extension of Time, Case No. 1:16-CV-00816-GSA

1 motions per week until mid-July. Defendant makes this request in good faith with no intention
2 to unduly delay the proceedings. The parties further stipulate that the Court's Scheduling Order
3 shall be modified accordingly.

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5 Respectfully submitted,

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7 Dated: June 12, 2017

/s/ *Melissa Newel
(*as authorized by email on June 12, 2017)
MELISSA NEWEL
Attorney for Plaintiff

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11 Dated: June 12, 2017

PHILLIP A. TALBERT
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15 By /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant U.S. Attorney
Attorneys for Defendant

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19 **ORDER**

20 APPROVED AND SO ORDERED.

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22 IT IS SO ORDERED.

23 Dated: June 16, 2017

/s/ Gary S. Austin
UNITED STATES MAGISTRATE JUDGE