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4 **UNITED STATES DISTRICT COURT**  
5 **EASTERN DISTRICT OF CALIFORNIA**  
6 **FRESNO DIVISION**  
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8 JENYNE THORNTON, ) Case No.: 1:16-CV-00816-GSA  
9 Plaintiff, )  
10 vs. ) **JOINT STIPULATION AND ORDER FOR**  
11 NANCY A. BERRYHILL, ) **EXTENSION OF TIME FOR**  
Acting Commissioner of Social Security, ) **DEFENDANT TO RESPOND TO**  
12 ) **PLAINTIFF'S MOTION FOR SUMMARY**  
13 Defendant. ) **JUDGMENT**  
14

15 IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record,  
16 that the time for responding to Plaintiff's Motion for Summary Judgment be extended for two  
17 weeks from July 19, 2017 to August 2, 2017. This is Defendant's second request for extension.  
18 Good cause exists to grant Defendant's request for extension. Additional time is required as  
19 counsel for Defendant had food poisoning last week and became behind on her caseload. Due to  
20 shortened staff and heavy caseload, Counsel for Defendant has over 50 active pending disability  
21 matters of which require 2+ dispositive motions per week until mid-late August. As a result,  
22 Counsel was not able to adequately research and review the transcript in time to properly  
23 respond to Plaintiff's Motion for Summary Judgment. Counsel for Defendant apologizes for the  
24 belated nature of this request, but did not anticipate seeking an additional extension due to her  
25 food poisoning and unanticipated medical leave. Defendant makes this request in good faith  
26 with no intention to unduly delay the proceedings. The parties further stipulate that the Court's  
27 Scheduling Order shall be modified accordingly.  
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Respectfully submitted,

Dated: July 17, 2017

/s/ \*Melissa Newel  
(\*as authorized by email on July 17, 2017)  
MELISSA NEWEL  
Attorney for Plaintiff

Dated: July 17, 2017

PHILLIP A. TALBERT  
United States Attorney  
DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX  
Social Security Administration

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

**ORDER**

Pursuant to the stipulation of the parties (Doc. 24), Defendant’s Opposition shall be filed no later than **August 2, 2017**. Any Reply shall be filed fifteen days after the filing of the Opposition.

IT IS SO ORDERED.

Dated: **July 18, 2017**

**/s/ Gary S. Austin**  
UNITED STATES MAGISTRATE JUDGE