

1 PHILLIP A. TALBERT
United States Attorney
2 DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
3 Social Security Administration
TINA L. NAICKER, CSBN 252766
4 Special Assistant United States Attorney
160 Spear Street, Suite 800
5 San Francisco, California 94105
Telephone: (415) 268-5611
6 Facsimile: (415) 744-0134
7 E-Mail: Tina.Naicker@SSA.gov

8 Attorneys for Defendant

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**

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 two
22 days from August 2, 2017 to **August 4, 2017**. This is Defendant's third request for extension.
23 Good cause exists to grant Defendant's request for extension. Additional time is required as
24 counsel for Defendant had a death in her family and is attending funeral and prayer services this
25 week. As such, Counsel needs additional time to properly respond to Plaintiff's Motion for
26 Summary Judgment. Counsel for Defendant apologizes for the belated nature of this request, but
27 did not anticipate seeking an additional extension due to the recent, unexpected death in her
28 family. Defendant makes this request in good faith with no intention to unduly delay the
JS for Extension of Time, Case No. 1:16-CV-00816-GSA

1 proceedings. The parties further stipulate that the Court's Scheduling Order shall be modified
2 accordingly.

3
4 Respectfully submitted,

5
6 Dated: July 31, 2017

/s/ *Melissa Newel
(*as authorized by email on July 31, 2017)
MELISSA NEWEL
Attorney for Plaintiff

7
8
9
10 Dated: July 31, 2017

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

11
12
13
14 By /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant U.S. Attorney
Attorneys for Defendant

15
16
17 **ORDER**

18
19 Pursuant to the stipulation of the parties (Doc. 26), Defendant's Opposition shall be filed
20 **no later than August 4, 2017**. Any Reply shall be filed fifteen days after the filing of the
21 Opposition.

22 IT IS SO ORDERED.

23
24 Dated: **July 31, 2017**

/s/ Gary S. Austin
UNITED STATES MAGISTRATE JUDGE