| 1 | PHILLIP A. TALBERT | |
|----|---|------------------------------|
| _ | United States Attorney DEBORAH LEE STACHEL | |
| 2 | Regional Chief Counsel, Region IX | |
| 3 | Social Security Administration | |
| 4 | SCOTT J. BORROWMAN, CSBN 241021 | |
| | Special Assistant United States Attorney | |
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| 8 | | |
| | Attorneys for Defendant | |
| 9 | UNITED STATES DISTRICT COURT | |
| 10 | | |
| 11 | EASTERN DISTRICT OF CALIFORNIA | |
| 11 | FRESNO DIVISION | |
| 12 | | |
| 13 | | Case No.: 1:16-cv-00944-GSA |
| 15 | JENNIFER ANN CONLEY, | Case No.: 1:10-cv-00944-05A |
| 14 | | STIPULATION AND ORDER FOR AN |
| 15 | Plaintiff, | EXTENSION OF TIME |
| | vs. | |
| 16 | NANCY A. BERRYHILL, Acting | |
| 17 | Commissioner of Social Security, () | |
| | | |
| 18 | Defendant. | |
| 19 | / | |
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| 20 | | |
| 21 | IT IS HEREBY STIPULATED, by and between the parties, through their respective | |
| 22 | counsel of record, that the time for Defendant to respond to Plaintiff's Opening Brief be | |

counsel of record, that the time for Defendant to respond to Plaintiff's Opening Brief be extended from February 22, 2017, to March 24, 2017. This is Defendant's first request for an extension of time to respond to Plaintiff's motion. Defendant respectfully requests this additional time because the undersigned accepted a position outside government and the office is in the process of reassigning my workload to attorneys in the office.

27 The parties further stipulate that the Court's Scheduling Order shall be modified28 accordingly.

| 1 | Counsel apologizes to the Court for any inconvenience caused by this delay. | |
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| 2 | | |
| 3 | Dated: January 25, 2017 Respectfully submitted, /s/_Nathaniel Riley | |
| 4 | (As authorized via email on January 25, 2017) OLINSKY LAW GROUP | |
| 5 | Attorneys for Plaintiff | |
| 6 | | |
| 7 | Dated: January 25, 2017 PHILLIP A. TALBERT United States Attorney | |
| 8 | DEBORAH LEE STACHEL | |
| 9 | Regional Chief Counsel, Region IX Social Security Administration | |
| 10 | | |
| 11 | By <u>/s/ Scott J. Borrowman</u> SCOTT J. BORROWMAN | |
| 12 | Special Assistant U.S. Attorney | |
| 13 | Attorneys for Defendant | |
| 14 | | |
| 15 | ORDER | |
| 16 | Pursuant to the parties' stipulation, Defendant's Opposition shall be filed no later than | |
| 17 | March 24, 2017 Any ranky shall be filed within fifteen (15) days of the filing of the encodition | |
| 18 19 | | |
| 19 20 | | |
| 20 | IT IS SO ORDERED. | |
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| 23 | Dated: January 30, 2017 /s/ Gary S. Austin UNITED STATES MAGISTRATE JUDGE | |
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