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8 Attorneys for Defendant

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

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13 ERIC BRIAN THOMAS,) Case No.: 1:16-CV-01044-EPG
14 Plaintiff,)
15 vs.) **STIPULATION AND ORDER FOR**
16 NANCY A. BERRYHILL,) **EXTENSION OF TIME FOR**
Acting Commissioner of Social Security,) **DEFENDANT TO FILE RESPONSE 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 one
22 week from May 19, 2017, to **May 26, 2017**. This is Defendant's second request for extension.
23 Good cause exists as counsel for Defendant is taking family medical leave on the date of the
24 current filing deadline for her mother's surgery. Counsel for Defendant also has a pending Ninth
25 Circuit due on the same date of the filing deadline. Counsel for Defendant apologizes for the late
26 request due to unforeseen circumstances and unanticipated family medical leave. Counsel did
27 not have sufficient time to adequately research the issues raised in Plaintiff's brief in time for the
28 current deadline. As such, Defendant respectfully requests additional time to respond to

1 Plaintiff's Motion for Summary Judgment. Defendant makes this request in good faith with no
2 intention to unduly delay the proceedings.

3 The parties further stipulate that the Court's Scheduling Order shall be modified
4 accordingly.

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6 Respectfully submitted,

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8 Dated: May 18, 2017

/s/ *Cyrus Safa
(*as authorized by email on May 18, 2017)
CYRUS SAFA
Attorney for Plaintiff

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11 Dated: May 18, 2017

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16 By /s/ Tina L. Naicker
TINA L. NAICKER
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Attorneys for Defendant
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ORDER

For the reasons provided in the parties' stipulation, good cause appears for an extension of time for responding to Plaintiff's Motion for Summary Judgment for one week from May 19, 2017, to May 26, 2017. All other deadlines are modified accordingly.

IT IS SO ORDERED.

Dated: May 19, 2017

/s/ Eric P. Groj
UNITED STATES MAGISTRATE JUDGE