

1 PHILLIP A. TALBERT  
United States Attorney  
2 DEBORAH STACHEL, CSBN 230138  
Regional Chief Counsel, Region IX  
3 ADAM LAZAR, CSBN 237485  
Special Assistant United States Attorney  
4 160 Spear Street, Suite 800  
San Francisco, CA 94105  
5 Phone: 415-268-5601  
Fax: 415-744-0134  
6 Adam.Lazar@ssa.gov

7 Attorneys for Defendant

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9 **UNITED STATES DISTRICT COURT**  
10 **EASTERN DISTRICT OF CALIFORNIA**

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12 DENZEL JOLIFF, ) Case No.: 1:16-cv-01058-BAM  
13 Plaintiff, )  
14 vs. ) **JOINT STIPULATION AND ORDER FOR**  
15 NANCY A. BERRYHILL, ) **EXTENSION OF TIME**  
Acting Commissioner of Social Security, )  
16 Defendant. )  
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18  
19 Defendant Nancy A. Berryhill, Acting Commissioner of Social Security (“Defendant”)  
20 respectfully requests that the Court extend the time for Defendant to file her Opposition to  
21 Plaintiff’s Opening Brief, originally due on April 13, 2017, by 60 days, through and including  
22 Tuesday, June 12, 2017. This is the Commissioner’s first request for an extension of time in this  
23 matter.

24 An extension of time is needed in order to prepare Defendant’s opposition because of the  
25 drafting attorney’s exceptionally heavy workload, in which the attorney must conduct pre-trial,  
26 participate in a multi-day hearing, and draft post-hearing briefs for a recently-scheduled  
27 arbitration, in addition to the attorney’s regular district court workload and drafting two Ninth  
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1 Circuit briefs. This request is made in good faith with no intention to unduly delay the  
2 proceedings. Counsel's office conferred with Plaintiff's counsel, who had no objection to this  
3 request, on April 12, 2017.

4 Respectfully submitted this 12th day of April, 2017.

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6 PHILLIP A. TALBERT  
7 United States Attorney  
8 DEBORAH STACHEL  
9 Regional Chief Counsel, Region IX

10 By /s/ Adam Lazar  
11 ADAM LAZAR  
12 Special Assistant U.S. Attorney  
13 Attorneys for Defendant

14 **ORDER**

15 Based upon the above stipulation of the parties, and for cause shown, IT IS HEREBY  
16 ORDERED that Defendant shall have an extension of time, to and including June 12, 2017, in  
17 which to file an Opposition to Plaintiff's Opening Brief; and that all other deadlines set forth in  
18 the Case Management Order shall be extended accordingly.

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20 IT IS SO ORDERED.

21 Dated: April 21, 2017

22 /s/ Barbara A. McAuliffe  
23 UNITED STATES MAGISTRATE JUDGE  
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