

1 PHILLIP A. TALBERT  
United States Attorney  
2 DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX  
3 Social Security Administration  
4 CAROLYN B. CHEN, CSBN 256628  
Special Assistant United States Attorney  
5 160 Spear Street, Suite 800  
San Francisco, California 94105  
6 Telephone: (415) 977-8956  
7 Facsimile: (415) 744-0134  
E-Mail: Carolyn.Chen@ssa.gov  
8 Attorneys for Defendant

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

12  
13 ANDY D. STOLTZNER, ) Case No.: 1:16-cv-01490-EPG  
14 Plaintiff, )  
15 vs. ) STIPULATION AND ORDER FOR AN  
16 NANCY A. BERRYHILL, ) EXTENSION OF TIME OF 10 DAYS FOR  
Acting Commissioner of Social Security, ) DEFENDANT’S RESPONSE TO  
17 Defendant. ) PLAINTIFF’S OPENING BRIEF  
18 )

19  
20 IT IS HEREBY STIPULATED, by and between the parties, through their respective  
21 counsel of record, that Defendant shall have an extension of time of an additional 10 days to  
22 respond to Plaintiff’s opening brief. This is the first continuance sought by Defendant. The  
23 current due date is October 3, 2017. The new due date will be October 13, 2017.

24 There is good cause for this request. Since the filing of Plaintiff’s opening brief,  
25 Defendant’s counsel has been diligently addressing her full workload including several district  
26 court cases and one Equal Employment Opportunity Commission matter involving discovery and  
27 travel for depositions. Moreover, Defendant’s counsel was recently ordered on October 2, 2017,  
28 to appear for a hearing on October 10, 2017. Therefore, Defendant is respectfully requesting

1 additional time up to and including October 13, 2017, to fully review the record and research the  
2 issues presented by Plaintiff's opening brief in this case. This request is made in good faith with  
3 no intention to unduly delay the proceedings.

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

6  
7 Respectfully submitted,

8 Date: October 3, 2017

LAW OFFICES OF LAWRENCE D. ROHLFING

9  
10 s/ Steven G. Rosales by C.Chen\*  
11 (As authorized by e-mail on 10/3/2017)  
12 STEVEN G. ROSALES  
13 Attorneys for Plaintiff

14 Date: October 3, 2017

PHILLIP A. TALBERT  
United States Attorney

15 By s/ Carolyn B. Chen  
16 CAROLYN B. CHEN  
17 Special Assistant U. S. Attorney

18 Attorneys for Defendant  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

1  
2  
3  
4  
5  
6  
7  
8  
9  
10  
11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

ORDER

For the reasons provided in the parties' stipulation, an extension of time of an additional 10 days to respond to Plaintiff's opening brief is GRANTED. The Court's Scheduling Order is modified accordingly.

IT IS SO ORDERED.

Dated: October 4, 2017

/s/ Eric P. Groj  
UNITED STATES MAGISTRATE JUDGE