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11 **UNITED STATES DISTRICT COURT**
12 **EASTERN DISTRICT OF CALIFORNIA - FRESNO**

13 VANESSA RAMIREZ, } Case No. 1:17-cv-00126-GSA
14 Plaintiff, }
15 v. } **UNOPPOSED MOTION FOR FIRST
16 NANCY A. BERRYHILL, EXTENSION OF TIME**
17 Acting Commissioner of Social }
18 Security, }
Defendant. }
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20 IT IS HEREBY STIPULATED, by and between Vanessa Ramirez (Plaintiff) and
21 Nancy A. Berryhill, Acting Commissioner of Social Security (Defendant), by and
22 through their respective counsel of record, that Defendant shall have an extension of
23 time of forty-five (45) days to file her Opposition to Plaintiff's Opening Brief. The
24 current due date is November 9, 2017. The new date will be December 26, 2017. An
25 extension of time is needed because the attorney responsible for briefing is still working
26 through a backlog of cases due to having been out on medical leave and many of her

cases due in November and December have already been extended. The office is extremely busy at this time, particularly with the approaching holidays, such that her cases cannot be transferred. This request is made in good faith with no intention to unduly delay the proceedings.

The parties further stipulate that the Court's Scheduling Order shall be modified accordingly, such that Plaintiff's reply brief shall be due January 10, 2018.

Respectfully submitted,

Date: November 6, 2017

LAWRENCE D. ROHLFING

By: /s/ Lawrence D. Rohlfing *

Law Offices of Lawrence D. Rohlfing

Attorney for Plaintiff

(*As authorized by e-mail on November 6, 2017)

Date: November 6, 2017

PHILLIP A. TALBERT

United States Attorney

/s/ Gina Tomaselli

GINA TOMASELLI

Special Assistant United States Attorney

Attorneys for Defendant

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ORDER

Pursuant to the parties' stipulation (Doc. 18), Defendant shall file her Opposition to Plaintiff's Opening Brief on or before **December 26, 2017**. Plaintiff shall file any optional Reply within fifteen (15) days of the filing of the Opposition.

IT IS SO ORDERED.

Dated: November 8, 2017

/s/ Gary S. Austin
UNITED STATES MAGISTRATE

JUDGE