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

13 VANESSA RAMIREZ,
14 Plaintiff,

15 v.

16 NANCY A. BERRYHILL,
17 Acting Commissioner of Social
18 Security,
19 Defendant.

) Case No. 1:17-cv-00126-GSA

) **UNOPPOSED MOTION FOR FIRST**
) **EXTENSION OF TIME**

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

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

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

7 Respectfully submitted,

8
9 Date: November 6, 2017

LAWRENCE D. ROHLFING

10 By: /s/ Lawrence D. Rohlfing *

11 Law Offices of Lawrence D. Rohlfing

12 Attorney for Plaintiff

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

13
14 Date: November 6, 2017

PHILLIP A. TALBERT

15 United States Attorney

16 /s/ Gina Tomaselli

17 GINA TOMASELLI

18 Special Assistant United States Attorney

19 Attorneys for Defendant

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IT IS SO ORDERED.

Dated: November 8, 2017

/s/ Gary S. Austin
UNITED STATES MAGISTRATE

JUDGE

/s/ Gary S. Austin
UNITED STATES MAGISTRATE

JUDGE