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

12 DAVID JOHN MARDIKIAN,) Case No: 1:17-cv-00181-GSA
13))
Plaintiff,) STIPULATION FOR EXTENSION OF TIME
14 vs.) BY DEFENDANT TO FILE HER RESPONSIVE
15) BRIEF (DEFENDANT’S FIRST REQUEST)
NANCY A. BERRYHILL, Acting Commissioner) AND ORDER
16 of the Social Security Administration,)
17 Defendant.)

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19 The parties hereby stipulate through counsel and with the Court’s approval that
20 Defendant’s time in which file and serve her responsive brief be extended from November 13,
21 2017, up until and including December 28, 2017. This is the first extension sought by Defendant.

22 There is good cause for this request. The undersigned needs to fly to Florida to attend to
23 his ailing mother who is in extremis and may not last through the weekend. In addition, I have
24 scheduled leave December 2, 2017, through December 9, 2017, making a shorter extension
25 problematic as I already have two briefs due the week of December 13, 2017. Plaintiff’s reply
26 would be due January 12, 2018.

27 This request is made in good faith with no intention to unduly delay the proceedings.

28 Stipulation and Order for Extension of Time

1 Counsel for Defendant conferred with Plaintiff's counsel by email on November 8, 2017,
2 who has no opposition to this request.

3 Respectfully submitted,

4 Dated: November 8, 2017

PHILIP TALBERT
United States Attorney
DEBORAH LEE STACHEL,
Regional Chief Counsel, Region IX
Social Security Administration

7 By: /s/Richard M. Rodriguez
8 RICHARD M. RODRIGUEZ
9 Special Assistant U.S. Attorney

10 Attorneys for Defendant

11
12 Dated: November 8, 2017

/s/Jonathan O. Pena, Esq.
By: Richard M. Rodriguez,
as authorized by email on November 8, 2017
JONATHAN O. PENA, ESQ., CSBN: 278044
Attorney for Plaintiff

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17 **ORDER**

Pursuant to the parties' stipulation (Doc. 15), Defendant shall file any Opposition **no later**
18 **than December 28, 2017**. Plaintiff shall file any optional Reply within fifteen days of the filing of the
19 Opposition.

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21 IT IS SO ORDERED.

22 Dated: November 13, 2017

/s/ Gary S. Austin
23 UNITED STATES MAGISTRATE JUDGE

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27 Stipulation and Order for Extension of Time

28 1:17-CV-00181-GSA