

1 PHILLIP A. TALBERT
United States Attorney
2 DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration
3 JENNIFER A. KENNEY
Special Assistant United States Attorney
4 160 Spear Street, Suite 800
5 San Francisco, California 94105
6 Telephone: (415) 977-8945
7 Facsimile: (415) 744-0134
8 E-Mail: Jennifer.A.Kenney@SSA.gov

9 Attorneys for Defendant

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

12 JOHN ALLEN GANN,) Case No.: 1:17-CV-00325-SKO
13)
14 Plaintiff,) STIPULATION AND ORDER FOR A FIRST
15 vs.) EXTENSION OF 30 DAYS FOR
16) DEFENDANT TO FILE HER OPPOSITION
17) TO PLAINTIFF'S OPENING BRIEF
18) (Doc. 16)
19)
20)
21)
22)
23)
24)
25)
26)
27)
28)

20 IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record,
21 that Defendant shall have an extension of time of 30 days to file her Opposition to Plaintiff's
22 Opening Brief. This is Defendant's first request for extension. The additional time is requested
23 due to Defendant's counsel's exceptionally heavy workload at this time, including two
24 employment law matters in active litigation before the Equal Employment Opportunity
25 Commission, as well as several other district court and 9th Circuit briefing deadlines imminent.
26 This extension will enable Defendant to adequately research the issues Plaintiff has presented.
27
28 The current due date is January 2, 2018. The new due date will be February 1, 2018.

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

3
4 Respectfully submitted,

5
6 Dated: December 29, 2017

/s/ *Marc V. Kalagian
(*as authorized by email on Dec. 29, 2017)
MARC V. KALAGIAN
Law Offices of Rohlfiing & Kalagian, LLP
Attorney for Plaintiff

7
8
9
10 Dated: December 29, 2017

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

11
12
13
14 By: /s/ Jennifer A. Kenney
JENNIFER A. KENNEY
Special Assistant U.S. Attorney
Attorneys for Defendant

15
16
17 **ORDER**

18 Pursuant to the parties' above "Stipulation for a First Extension of 30 Days for Defendant
19 to file her Opposition to Plaintiff's Opening Brief" (Doc. 16), IT IS HEREBY ORDERED that
20 Defendant has until February 1, 2018, to submit her response to Plaintiff's Opening Brief. All
21 other dates in the Scheduling Order (Doc. 6) shall be extended accordingly.

22
23 IT IS SO ORDERED.

24
25 Dated: January 3, 2018

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE