

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

13 Attorneys for Defendant

14 **UNITED STATES DISTRICT COURT**
15 **EASTERN DISTRICT OF CALIFORNIA**

16 **FRESNO DIVISION**

17 PATTY REYES,) Case No.: 1:17-CV-00340-BAM
18)
19 Plaintiff,) STIPULATION AND ORDER FOR A FIRST
20) EXTENSION OF 30 DAYS FOR
21) DEFENDANT TO FILE HER OPPOSITION
22) TO PLAINTIFF'S OPENING BRIEF
23 NANCY A. BERRYHILL,)
24 Acting Commissioner of Social Security,)
25)
26 Defendant.)
27)
28)

29
30 IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record,
31 that Defendant shall have an extension of time of 30 days to file her Opposition to Plaintiff's
32 Opening Brief. This is Defendant's first request for extension. Defendant's counsel is
33 experiencing an unanticipated medical issue that has caused her to be out of the office
34 unexpectedly. The additional time requested will enable Defendant to address properly the
35 issues Plaintiff has presented. The current due date is November 22, 2017. The new due date
36 will be December 22, 2017. The parties further stipulate that the Court's Scheduling Order shall
37
38

1 be modified accordingly.

2
3 Respectfully submitted,

4
5 Dated: November 22, 2017

*/s/ *Stuart T. Barasch*
(*as authorized by email on Nov. 22, 2017)
STUART T. BARASCH
Attorney for Plaintiff

6
7 Dated: November 22, 2017

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

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

15
16 **ORDER**

17 Based upon the stipulation of the parties, and for cause shown, IT IS HEREBY
18 ORDERED, that Defendant shall have a thirty-day extension of time, to and including
19 December 22, 2017, in which to file a response Plaintiff's Motion for Summary Judgment; and
20 that all other deadlines set forth in the Court's Scheduling Order shall be extended accordingly.

21 IT IS SO ORDERED.

22
23 Dated: November 20, 2017

/s/ Barbara A. McAuliffe

24
25 UNITED STATES MAGISTRATE JUDGE