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

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13 MICHELLE FARNSWORTH, ) Case No.: 1:17-CV-00653-BAM  
14 Plaintiff, )  
15 vs. ) **JOINT STIPULATION AND ORDER FOR**  
16 ) **EXTENSION OF TIME**  
17 NANCY A. BERRYHILL )  
18 Acting Commissioner of Social Security, )  
19 Defendant. )

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21 Defendant Nancy A. Berryhill, Acting Commissioner of Social Security (“Defendant”)  
22 respectfully requests that the Court extend the time for Defendant to file her Opposition to  
23 Plaintiff’s Motion for Summary Judgment, originally due on January 19, 2018 by 31 days,  
24 through and including Monday, February 19, 2018. This is the Commissioner’s first request for  
25 an extension of time in this matter.

26 An extension of time is needed in order to prepare Defendant’s opposition because the  
27 briefing attorney is leaving the agency and a new attorney has been assigned, who will require  
28

1 sufficient time to familiarize and brief this matter. This request is made in good faith with no  
2 intention to unduly delay the proceedings.

3 Counsel's office conferred with Plaintiff's counsel, who had no objection to this request,  
4 on January 10, 2018.

5 Respectfully submitted,

6 Dated: January 10, 2018

MCGREGOR W. SCOTT  
United States Attorney  
DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX  
Social Security Administration

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10 By: /s/ Adam Lazar  
ADAM LAZAR  
Special Assistant U.S. Attorney  
Attorneys for Defendant

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13 Dated: January 10, 2018

By: /s/ Stewart Barasch\*  
STEWART BARASCH  
(\*by email authorization)  
Attorney for Plaintiff

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18 **ORDER**

19 Based upon the stipulation of the parties, and for cause shown, IT IS HEREBY  
20 ORDERED, that Defendant shall have a thirty-one day extension of time, to and including  
21 **February 19, 2018**, in which to file a response Plaintiff's Motion for Summary Judgment; and  
22 that all other deadlines set forth in the Court's Scheduling Order shall be extended accordingly.

23 IT IS SO ORDERED.

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25 Dated: January 16, 2018

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE

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