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8 Attorneys for Defendant

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

12
13 HAROLD GRINSTEAD,) Case No.: 2:14-cv-00059-KJN
14 Plaintiff,)
15 vs.) STIPULATION FOR AN EXTENSION OF
16 CAROLYN W. COLVIN,) TIME OF 30 DAYS FOR DEFENDANT'S
Acting Commissioner of Social Security,) RESPONSE TO PLAINTIFF'S MOTION
17 Defendant.) FOR SUMMARY JUDGMENT
18)

19 IT IS HEREBY STIPULATED, by and between the parties, through their respective
20 counsel of record, that Defendant shall have an extension of time of an additional 30 days to
21 respond to Plaintiff's motion for summary judgment. This is the first continuance sought by
22 Defendant. The current due date is September 5, 2014. The new due date will be October 5,
23 2014.

24 There is good cause for this request. Defendant is seeking this extension due to
25 Defendant's counsel's heavy workload in the last two months and continuing heavy workload,
26 and due to pre-approved leave in September. For the last two months, Defendant's counsel was
27 limited in her ability to work on this case due to two Equal Employment Opportunity
28 Commission (EEOC) cases, one of which had an out-of-state hearing in Phoenix, Arizona, and

1 involved follow-up and written closing briefs after the hearing, while the other had a motion for
2 summary judgment coming due in September. Counsel also had a Ninth Circuit opposition brief
3 due in August, and has another Ninth Circuit answering brief due in the next month, and at least
4 16 pending district court cases at various stages of litigation in the next month. Because of the
5 factors described above, defense counsel is requesting additional time to fully review the
6 administrative record and research the issues presented by Plaintiff's motion for summary
7 judgment.

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

10
11 Respectfully submitted,

12 Date: September 4, 2014

HADLEY & FRAULOB

13
14 s/ Joseph Fraulob by C.Chen*
15 (As authorized by e-mail on 9/4/2014)
16 JOSEPH FRAULOB
17 Attorneys for Plaintiff

18 Date: September 4, 2014

BENJAMIN B. WAGNER
United States Attorney

19 By s/ Carolyn B. Chen
20 CAROLYN B. CHEN
21 Special Assistant U. S. Attorney

22 Attorneys for Defendant

23 ORDER

24 APPROVED AND SO ORDERED:

25 Dated: September 5, 2014

26
27 
28 KENDALL J. NEWMAN
UNITED STATES MAGISTRATE JUDGE