

1 BENJAMIN B. WAGNER
United States Attorney
2 DEBORAH LEE STACHEL
Acting Regional Chief Counsel, Region IX
3 Social Security Administration
4 ROYA MASSOUMI, CSBN 242697
Special Assistant United States Attorney
5 160 Spear Street, Suite 800
6 San Francisco, California 94105
Telephone: (415) 977-8957
7 Facsimile: (415) 744-0134
8 E-Mail: Roya.Massoumi@SSA.gov

9 Attorneys for Defendant

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

12 NOUKONE VONGDENG,) Case No.: 2:15-CV-01071-CKD
13)
14 Plaintiff,) STIPULATION AND ORDER FOR
15 vs.) EXTENSION OF TIME FOR DEFENDANT
16) TO FILE OPPOSITION TO PLAINTIFF'S
17) MOTION FOR SUMMARY JUDGMENT
18)
19)
20)
21)
22)
23)
24)
25)
26)
27)
28)

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Summary Judgment be extended from April 11, 2016, to **May 2, 2016**. This is Defendant's second request for extension of time. Defendant respectfully requests additional time following a recent unexpected death in counsel for Defendant's family. Defendant makes this request in good faith with no intention to unduly delay the proceedings.

////

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

3
4 Respectfully submitted,

5
6 Dated: April 7, 2016

/s/ *Bess Brewer
(*as authorized by email on April 6, 2016)
BESS M. BREWER
Attorney for Plaintiff

7
8
9 Dated: April 7, 2016

BENJAMIN B. WAGNER
United States Attorney
DEBORAH LEE STACHEL
Acting Regional Chief Counsel, Region IX,
Social Security Administration

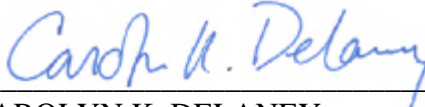
10
11
12
13 By: /s/ Roya Massoumi
14 ROYA MASSOUMI
15 Special Assistant U.S. Attorney
Attorneys for Defendant

16 Of Counsel:
17 TINA L. NAICKER
18 Assistant Regional Counsel
Attorneys for Defendant

19
20 **ORDER**

21 APPROVED AND SO ORDERED:

22 Dated: April 8, 2016

23 
24 _____
CAROLYN K. DELANEY
25 UNITED STATES MAGISTRATE JUDGE
26
27
28