

1 PHILLIP A. TALBERT
Acting United States Attorney
2 DEBORAH LEE STACHEL, CA SBN 230138
Acting Regional Chief Counsel, Region IX
3 Social Security Administration
4 ELLINOR R. CODER, CA SBN 258258
Special Assistant United States Attorney
5 160 Spear Street, Suite 800
San Francisco, California 94105
6 Telephone: (415) 977-8955
7 Facsimile: (415) 744-0134
E-Mail: Ellinor.Coder@ssa.gov
8

9 Attorneys for Defendant

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

13 MIGUEL ANGEL MORALES,)	No. 2:15-cv-01822-CKD (TEMP)
)	
14 Plaintiff,)	STIPULATION AND ORDER TO EXTEND
)	BRIEFING SCHEDULE
15 vs.)	
16 CAROLYN W. COLVIN,)	
Acting Commissioner of Social Security,)	
)	
18 Defendant.)	
)	

20 IT IS HEREBY STIPULATED, by and between the parties, through their respective
21 counsel of record, that the deadline for Defendant to respond to Plaintiff's Motion For Summary
22 Judgment and/or to file any cross-motion thereto be extended by thirty (30) days. Plaintiff filed
23 her brief on June 21, 2016 after one extension.
24

25 There is good cause for this extension because Defendant needs additional time to draft
26 and file her brief due to the heavy workload of Defendant's attorney assigned to this case. In
27 addition, counsel assigned to draft the Commissioner's responsive brief is not yet cleared as a
28

1 Special Assistant United States Attorney. Consequently, supervisory attorneys at the Social
2 Security Administration's Office of General Counsel must review the Commissioner's brief prior
3 to filing.

4 The current due date for Defendant's motion is July 21, 2016. With the Court's approval,
5 the new due date would be August 19, 2016. The parties further stipulate that the Court's
6 Scheduling Order shall be modified accordingly.

8
9 Dated: July 11, 2016

Respectfully submitted,
/s/ Bess Brewer
BESS BREWER
Attorney for Plaintiff
*Authorized via e-mail on July 11, 2016

12 Dated: July 11, 2016

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

16 By: /s/ Ellinor R. Coder
ELLINOR R. CODER
Special Assistant U.S. Attorney
Attorneys for Defendant

19 OF COUNSEL TO DEFENDANT

20 HAY-MIE CHO
21 Assistant Regional Counsel

23 **ORDER**

24 Pursuant to the parties' stipulation, IT IS SO ORDERED.

25 Dated: July 13, 2016

26 
27 CAROLYN K. DELANEY
28 UNITED STATES MAGISTRATE JUDGE

BVD\morales1822.stip.eot.ord