

PHILLIP A. TALBERT
 Acting United States Attorney
 DEBORAH LEE STACHEL
 Acting Regional Chief Counsel, Region IX
 Social Security Administration
 JENNIFER A. KENNEY, CSBN 241625
 Special Assistant United States Attorney
 160 Spear Street, Suite 800
 San Francisco, California 94105
 Telephone: (415) 977-8945
 Facsimile: (415) 744-0134
 E-Mail: jennifer.a.kenney@ssa.gov

Attorneys for Defendant

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

CHARLENE ANN PADLO,) Case No.: 2:15-CV-01953-AC
)
Plaintiff,) STIPULATION AND PROPOSED ORDER
) FOR A FIRST EXTENSION OF 30 DAYS
vs.) FOR DEFENDANT TO RESPOND TO
) PLAINTIFF'S MOTION FOR SUMMARY
CAROLYN W. COLVIN, Acting) JUDGMENT AND FILE ITS CROSS-
Commissioner of Social Security,) MOTION FOR SUMMARY JUDGMENT
)
Defendant.)
)

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that Defendant shall have a first extension of time of 30 days to respond to Plaintiff's Motion for Summary Judgment and file her Cross-Motion for Summary Judgment. This extension is requested because Defendant's counsel is experiencing an exceptionally busy workload at this time, including three other briefing deadlines before the district court and the Equal Employment Opportunity Commission due the same week as the responsive pleading in this case. The additional time will enable Defendant's counsel to adequately research the issues presented in this case. The current due date is May 31, 2016. The new due date will be June 30, 2016.

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

3
4 Respectfully submitted,

5
6 Dated: May 31, 2016

/s/ Steven Rosales*
(*as authorized by email on May 31, 2016)
STEVEN ROSALES
Attorney for Plaintiff

7
8
9 Dated: May 31, 2016

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

11
12
13 By: /s/ Jennifer A. Kenney
14 JENNIFER A. KENNEY
15 Special Assistant U.S. Attorney
Attorneys for Defendant

16
17 **ORDER**

18 APPROVED AND SO ORDERED:

19 DATED: June 2, 2016

20 Allison Claire
21 ALLISON CLAIRE
22 UNITED STATES MAGISTRATE JUDGE
23
24
25
26
27
28