1	PHILLIP A. TALBERT		
2	Acting United States Attorney DEBORAH LEE STACHEL		
$\begin{bmatrix} 2 \\ 3 \end{bmatrix}$	Regional Chief Counsel, Region IX		
	Social Security Administration ASIM H. MODI Special Assistant United States Attorney		
4			
5	Social Security Administration 160 Spear Street, Suite 800		
6	San Francisco, CA 94105 Telephone: 415-977-8952		
7	Facsimile: 415-744-0134		
8	Email: Asim.Modi@ssa.gov Attorneys for Defendant		
9			
10	UNITED STATES DISTRICT COURT		
11	EASTERN DISTRICT OF CALIFORNIA		
12	SACRAMENTO DIVISION		
13	MICHELLE L. BUCHET, ) (	Case No. 2:15-cv-2431-CMK	
14	Plaintiff,	STIPULATION AND ORDER TO	
15	[] · · · · · · · · · · · · · · · · · · ·	EXTEND BRIEFING SCHEDULE	
16	v. )		
17	CAROLYN W. COLVIN		
18	Acting Commissioner of Social Security, )		
19	Defendant.		
20			
21	IT IS HEREBY STIPULATED by the parties, through their undersigned attorneys, to		
22	extend Defendant's time to file her cross-motion for summary judgment with the Court by 30		
23	days to <b>September 28, 2016</b> , and that all other scheduling dates set forth in the Court's Case		
24	Management Order shall be extended accordingly. This is Defendant's second request for an		
25	extension of time in this matter <sup>1</sup> , and she requests it in good faith and without any intent to		
26	prolong proceedings unduly.		
27			
28	On April 26, 2016, the Commissioner filed a stippe the certified administrative record and file an answ	ulation for an extension of 45 days to prepare er to Plaintiff's complaint (CR 10). However,	

1	There is good cause for this extension	on request. First, a 30-day extension is necessary	
2	because counsel for Defendant was (or will	be) out of the office for significant portions of the	
3	period between August 15 and 29, 2016, and requires additional time to adequately research and		
4	analyze the factual record and Plaintiff's le	gal claims. Second, counsel for Defendant has	
5	workload issues that preclude filing the summary judgment motion by August 29, 2016.		
6	Specifically, in addition to the work-related travel and personal leave referenced above, counsel		
7	for Defendant is responsible for drafting various pleadings before the district courts within the		
8	Ninth Circuit, drafting an appellate pleading in a Social Security matter before the Ninth Circuit,		
9	and negotiating or litigating attorney fee matters pursuant to the Equal Access to Justice Act.		
10	Counsel for Defendant is also currently responsible for conducting discovery and drafting briefs		
11	personnel litigation before the Equal Employment Opportunity Commission and Merit Systems		
12	Protection Board.		
13	Counsel for Defendant apologizes to Plaintiff and the Court for any inconvenience cause		
14	by this delay.		
15			
16		Respectfully submitted,	
17			
18	Date: <u>August 26, 2016</u>	LAW OFFICES OF LAWRENCE D. ROHLFING	
19	Dyn		
20	By:	/s/ Asim H. Modi for Monica Perales* MONICA PERALES	
21		*Authorized by email on August 26, 2016 Attorneys for Plaintiff	
22	Data: August 26, 2016	·	
23	Date: <u>August 26, 2016</u>	PHILLIP A. TALBERT Acting United States Attorney	
24		DEBORAH LEE STACHEL Regional Chief Counsel, Region IX	
25		Social Security Administration	
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this is the Commissioner's first request for an extension of time to file her summary judgment motion.

28

1	By:	/s/ Asim H. Modi
2		ASIM H. MODI Special Assistant United States Attorney
3		Attorneys for Defendant
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5		
6		<u>ORDER</u>
7		
8	APPROVED AND SO ORDERED	
9		
10	Dated: August 30, 2016	la m Killian
11		CRAIG M. KELLISON
12		UNITED STATES MAGISTRATE JUDGE
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