

1 PHILIP A. TALBERT  
Acting United States Attorney  
2 DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX  
Social Security Administration  
4 JEFFREY CHEN, CSBN 260516  
Special Assistant United States Attorney  
5 Social Security Administration  
160 Spear Street, Suite 800  
6 San Francisco, CA 94105  
7 Telephone: (415) 977-8939  
8 Facsimile: (415) 744-0134  
Email: Jeffrey.Chen@ssa.gov  
9 Attorneys for Defendant

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

14 LISA DESCHRYVER, ) Civil No. 2:16-cv-00146-TLN-CKD  
15 Plaintiff, )  
16 v. ) **STIPULATION AND ORDER FOR A**  
17 ) **FIRST EXTENSION OF TIME FOR**  
18 CAROLYN W. COLVIN, ) **DEFENDANT TO FILE HER MSJ**  
Acting Commissioner of Social Security, )  
19 Defendant. )  
20 )

21 IT IS HEREBY STIPULATED by the parties, through their undersigned attorneys, and  
22 with the approval of the Court, that Defendant shall have a first extension of time of 30 days to  
23 file her motion for summary judgment. Defendant apologizes for improperly calendaring this  
24 case schedule and respectfully requests this extension of time because of a very heavy workload,  
25 including an upcoming Ninth Circuit brief, and to allow for proper evaluation of the record to  
26 determine the possibility of voluntary remand in lieu of further litigation.

27  
28 Stip. to Extend Def.'s MSJ

1 The new due date for Defendant's motion for summary judgment will be Monday,  
2 September 19, 2016.

3  
4 Respectfully submitted,

5 Date: August 29, 2016

CHERMOL & FISHMAN, LLC

6 By: /s/ David F. Chermol\*  
7 DAVID F. CHERMOL  
8 \* By email authorization on August 29, 2016  
Attorney for Plaintiff

9 Date: August 29, 2016

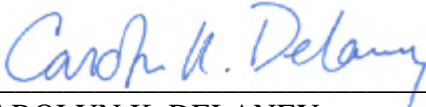
PHILIP A. TALBERT  
Acting United States Attorney

10  
11 By: /s/ Jeffrey Chen  
12 JEFFREY CHEN  
13 Special Assistant United States Attorney  
14 Attorneys for Defendant

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16  
17 ORDER

18  
19 APPROVED AND SO ORDERED:

20 Dated: August 31, 2016

21   
22 \_\_\_\_\_  
23 CAROLYN K. DELANEY  
24 UNITED STATES MAGISTRATE JUDGE

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26  
27  
28 Stip. to Extend Def.'s MSJ