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

13 RONALD LEE BURLEY,)	Case No.: 2:16-cv-00485-EFB
)	
14 Plaintiff,)	STIPULATION FOR AN EXTENSION OF
)	TIME OF 50 DAYS FOR DEFENDANT'S
15 vs.)	RESPONSE TO PLAINTIFF'S MOTION
16 CAROLYN W. COLVIN,)	FOR SUMMARY JUDGMENT
Acting Commissioner of Social Security,)	
)	
17 Defendant.)	
)	

19 IT IS HEREBY STIPULATED, by and between the parties, through their respective
 20 counsel of record, that Defendant shall have an extension of time of an additional 50 days to
 21 respond to Plaintiff's motion for summary judgment. This is the first continuance sought by
 22 Defendant. The current due date is December 28, 2016. The new due date will be February 16,
 23 2017.

24 There is good cause for this request. Defendant is seeking this extension due to medical
 25 emergencies, workload issues, and the holidays. At around the time of the filing of Plaintiff's
 26 Motion for Summary Judgment, Defendant's counsel was recovering from a medical emergency
 27 that occurred Monday, October 24, 2016, that necessitated her being on leave for about a week.

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1 Upon her return to the office, Defendant's counsel had to address her workload
2 deadlines that were postponed due to her leave, as well as a motion for summary judgment for an
3 Equal Employment Opportunity Commission case that required more time to complete due to a
4 voluminous record since the case involved multiple matters consolidated into one case over a
5 span of a few years. In addition, recently, on December 9, 2016, Defendant's counsel was rear-
6 ended in a car accident caused by another driver who did not properly stop at a traffic light, and
7 has been on leave to recover from the accident. In addition, Defendant's counsel was granted
8 approval for leave for the holiday season.

9 Because of the factors described above, Defendant is requesting additional time up to and
10 including February 16, 2017, to fully review the record and research the issues presented by
11 Plaintiff's motion for summary judgment, as Defendant's counsel recovers and addresses her
12 workload upon her return. This request is made in good faith with no intention to unduly delay
13 the proceedings.

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

16 Respectfully submitted,

17 Date: December 22, 2016

ZISKIN LAW OFFICE

18 s/ Linda Susan Ziskin by C.Chen*
19 (As authorized by e-mail on 12/21/2016)
20 LINDA SUSAN ZISKIN
21 Attorneys for Plaintiff

22 Date: December 22, 2016

PHILLIP A. TALBERT
United States Attorney

23 By s/ Carolyn B. Chen
24 CAROLYN B. CHEN
25 Special Assistant U. S. Attorney

26 Attorneys for Defendant

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ORDER

APPROVED AND SO ORDERED.

DATED: December 28, 2016

A handwritten signature in blue ink, appearing to read "Edmund F. Brennan", written over a horizontal line.

HON. EDMUND F. BRENNAN
UNITED STATE MAGISTRATE JUDGE

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