

1 PHILLIP A. TALBERT
 United States Attorney
 2 DEBORAH LEE STACHEL
 Regional Chief Counsel, Region IX
 3 Social Security Administration
 SHARON LAHEY
 4 Special Assistant United States Attorney
 5 160 Spear Street, Suite 800
 San Francisco, California 94105
 6 Telephone: 415-977-8963
 7 Facsimile: 415-744-0134
 E-Mail: Sharon.Lahey@ssa.gov

8 Attorneys for Defendant

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

13 CHRISTINA SHAWN SCHMIDT,
 14 Plaintiff,
 15 vs.
 16 CAROLYN W. COLVIN,
 Acting Commissioner of Social Security,
 17 Defendant.
 18

) Case No.: 2:16-CV-00516-AC
)
) **STIPULATION AND ~~PROPOSED~~ ORDER**
) **FOR EXTENSION OF TIME**
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 20 IT IS HEREBY STIPULATED, by and between the parties, through their respective
 21 counsel of record, that the time for Defendant to respond to Plaintiff’s Motion for Summary
 22 Judgment be extended by 30 days. The current deadline is November 28, 2016, and the new
 23 deadline would be December 28, 2016. This is Defendant’s first request for an extension of time
 24 and the second request for an extension of time in the above-captioned matter. Defense counsel
 25 requests this additional time to adequately address the issues Plaintiff raises in her Motion for
 26 Summary Judgment due to the undersigned counsel’s current workload, which includes 15
 27 dispositive district-court briefs due prior to the requested deadline. The parties further stipulate
 28 that the Court’s Scheduling Order shall be modified accordingly.

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Respectfully submitted,

Dated: November 22, 2016

/s/ Joseph C. Fraulob*
JOSEPH C. FRAULOB
(*As authorized on November 22, 2016)

Attorneys for Plaintiff

Dated: November 22, 2016

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

By: /s/ Sharon Lahey
SHARON LAHEY
Special Assistant United States Attorney
Attorneys for Defendant

ORDER

Good cause appearing, and pursuant to stipulation, it is approved and so ORDERED.
Defendant shall respond to Plaintiff's Motion for Summary Judgment on or before December 28,
2016. Any reply shall be due on or before January 17, 2017.

Dated: November 28, 2016

Allison Claire
ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE