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

13 BRIDGETT JANE MARIE FELIX,)	Case No.: 2:16-cv-00698-EFB
14 Plaintiff,)	
15 vs.)	STIPULATION FOR AN EXTENSION OF
16 CAROLYN W. COLVIN,)	TIME OF 14 DAYS FOR DEFENDANT'S
Acting Commissioner of Social Security,)	RESPONSE TO PLAINTIFF'S MOTION
17 Defendant.)	FOR SUMMARY JUDGMENT
18)	

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 14 days to
 21 respond to Plaintiff's motion for summary judgment. This is the second continuance sought by
 22 Defendant. The current due date is November 14, 2016. The new due date will be November
 23 28, 2016.

24 There is good cause for this request. Defendant is seeking this extension due to an
 25 emergency and workload issues. Since the Court's order of extension dated October 12, 2016,
 26 Defendant's counsel had a medical emergency on Monday, October 24, 2016, and was on leave
 27 for about a week.

1 Defendant is requesting additional time up to and including November 28, 2016, to fully
2 review the record and research the issues presented by Plaintiff's motion for summary judgment,
3 as Defendant's counsel addresses her workload since her return. This request is made in good
4 faith with no intention to unduly delay the proceedings.

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

7 Respectfully submitted,

8 Date: November 10, 2016

CERNEY KREUZE & LOTT, LLP

9
10 *s/ Langley Ellen Kreuze by C.Chen**
11 (As authorized by e-mail on 11/10/2016)
12 LANGLEY ELLEN KREUZE
13 Attorneys for Plaintiff

14 Date: November 10, 2016

PHILLIP A. TALBERT
Acting United States Attorney

15 By *s/ Carolyn B. Chen*
16 CAROLYN B. CHEN
17 Special Assistant U. S. Attorney

18 Attorneys for Defendant

19 ORDER

20 APPROVED AND SO ORDERED.

21 DATED: November 16, 2016.

22 

23 HON. EDMUND F. BRENNAN
24 UNITED STATE MAGISTRATE JUDGE