

1 PHILLIP A. TALBERT
 United States Attorney
 2 DEBORAH LEE STACHEL
 Regional Chief Counsel, Region IX
 3 Social Security Administration
 TINA L. NAICKER, CSBN 252766
 4 Special Assistant United States Attorney
 160 Spear Street, Suite 800
 5 San Francisco, California 94105
 Telephone: (415) 268-5611
 6 Facsimile: (415) 744-0134
 E-Mail: Tina.Naicker@SSA.gov
 7

8 Attorneys for Defendant

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

13 TATYANA PLUMMER,)	Case No.: 2:16-CV-00753-AC
)	
14 Plaintiff,)	JOINT STIPULATION FOR EXTENSION
)	OF TIME FOR DEFENDANT TO
15 vs.)	RESPOND TO PLAINTIFF'S MOTION
16 NANCY A. BERRYHILL,)	FOR SUMMARY JUDGMENT
Acting Commissioner of Social Security,)	
)	
17 Defendant.)	
)	

19

20 IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record,
 21 that the time for responding to Plaintiff's Motion for Summary Judgment be extended from April
 22 20, 2017, to **April 28, 2017** due to counsel for Defendant's unanticipated medical leave. Good
 23 cause exists to grant the extension. Counsel for Defendant was out of the office the week prior
 24 due to take care of her elderly mother. In addition, counsel has been suffering from debilitating
 25 migraines, which has caused Defendant to take unanticipated medical leave for herself and her
 26 mother. In addition, counsel needs additional time in order to complete the agency's review
 27 process for newer attorneys.
 28

Joint Stipulation for Extension of Time; 2:16-CV-00753-AC

1 This is Defendant's third request for extension. Defendant respectfully requests
2 additional time to respond to Plaintiff's Motion for Summary Judgment in order to adequately
3 research and analyze the issues presented by Plaintiff. Defendant makes this request in good
4 faith with no intention to unduly delay the proceedings. Defendant will diligently meet the new
5 deadline.

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

8 Respectfully submitted,

9
10 Dated: April 20, 2017

/s/ *Jesse Kaplan
(*as authorized by email on April 19, 2017)
JESSE KAPLAN
Attorney for Plaintiff

11
12
13
14 Dated: April 20, 2017

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


15
16
17
18 By /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant U.S. Attorney

19
20 Attorneys for Defendant

21 **ORDER**

22
23 APPROVED AND SO ORDERED:

24 DATED: April 20, 2017

25 
26 ALLISON CLAIRE
27 UNITED STATES MAGISTRATE JUDGE
28