

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
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8 Attorneys for Defendant

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

13 TATYANA PLUMMER,
 14 Plaintiff,
 15 vs.
 16 NANCY A. BERRYHILL,
 Acting Commissioner of Social Security,
 17 Defendant.
 18

) Case No.: 2:16-CV-00753-AC

) **JOINT STIPULATION FOR EXTENSION**
) **OF TIME FOR DEFENDANT TO**
) **RESPOND TO PLAINTIFF'S MOTION**
) **FOR SUMMARY JUDGMENT**

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 an
 22 additional week from April 28, 2017, to **May 5, 2017**. Good cause exists to grant the extension.
 23 Counsel for Defendant had a recent unexpected medical emergency with her mother that
 24 required immediate medical attention. Counsel is the sole caregiver for her mother. Defendant
 25 is expected to be out of the office on April 28, 2017, the current deadline, in order to take her
 26 mother to the hospital.

27 This is Defendant's fourth request for extension. Defendant respectfully requests
 28 additional time to respond to Plaintiff's Motion for Summary Judgment in order to adequately

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

1 research and analyze the issues presented by Plaintiff. Defendant makes this request in good
2 faith with no intention to unduly delay the proceedings. Defendant will diligently meet the new
3 deadline.

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

6 Respectfully submitted,

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8 Dated: April 27, 2017

/s/ *Jesse Kaplan
(*as authorized by email on April 27, 2017)
JESSE KAPLAN
Attorney for Plaintiff

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10
11
12 Dated: April 27, 2017

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

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

17
18 Attorneys for Defendant

19 **ORDER**

20 APPROVED AND SO ORDERED:

21
22
23
24 DATED: April 27, 2017

Allison Claire
ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE