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8 Attorneys for Defendant

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 10 **UNITED STATES DISTRICT COURT**
 11 **EASTERN DISTRICT OF CALIFORNIA**

13 MARIAN OWEN,)	Case No.: 2:16-cv-00912-CMK
)	
14 Plaintiff,)	JOINT STUPULATION AND ORDER
)	FOR EXTENSION OF TIME
15 vs.)	
)	
16)	
17 NANCY A. BERRYHILL)	
Acting Commissioner of Social Security,)	
)	
18 Defendant.)	

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 20
 21 Defendant Nancy A. Berryhill, Acting Commissioner of Social Security (“Defendant”)
 22 respectfully requests that the Court extend the time for Defendant to file her Opposition to
 23 Plaintiff’s Opening Brief, due on June 23, 2017, by 30 days, through and including Monday ,
 24 July 24, 2017 (30 days falls on the preceding weekend). This is the Commissioner’s second
 25 request for an extension of time in this matter.

26 Counsel for Defendant is getting married on June 24, which has caused significant
 27 additional pressure on counsel’s schedule. In addition, an extension of time is needed in order to
 28 prepare Defendant’s opposition because of counsel’s workload in the current two-week period,

1 including a Ninth Circuit answering brief, another summary judgment motion, an EAJA
2 opposition, and a motion to remand, in addition to the brief due in this matter.

3 This request is made in good faith with no intention to unduly delay the proceedings.
4 Counsel's office conferred with Plaintiff's counsel, who had no objection to this request, on June
5 21, 2017.

6
7 Respectfully submitted,

8 Dated: June 21, 2017

9 PHILIP A. TALBERT
10 United States Attorney
11 DEBORAH LEE STACHEL
12 Regional Chief Counsel, Region IX
13 Social Security Administration

14 By: /s/ Adam Lazar
15 ADAM LAZAR
16 Special Assistant U.S. Attorney
17 Attorneys for Defendant

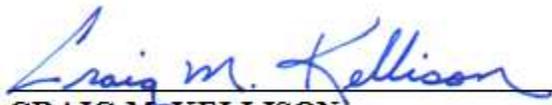
18 Dated: June 21, 2017

19 By: /s/ Linda Ziskin*
20 LINDA ZISKIN
21 (*by email authorization on June 21, 2017)
22 Attorney for Plaintiff

23
24 **ORDER**

25 IT IS SO ORDERED.

26 Dated: June 29, 2017

27
28 
CRAIG M. KELLISON
UNITED STATES MAGISTRATE JUDGE