

1 PHILLIP A. TALBERT
 United States Attorney
 2 DEBORAH LEE STACHEL
 Regional Chief Counsel, Region IX
 3 Social Security Administration
 CAROLYN B. CHEN, CSBN 256628
 4 Special Assistant United States Attorney
 5 160 Spear Street, Suite 800
 San Francisco, California 94105
 6 Telephone: (415) 977-8956
 7 Facsimile: (415) 744-0134
 E-Mail: Carolyn.Chen@ssa.gov
 8 Attorneys for Defendant

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

13 FRANCISCO ROBERTO VASQUEZ,)	Case No.: 2:16-cv-00941-CMK
14 Plaintiff,)	
15 vs.)	MOTION FOR AN EXTENSION OF TIME
16 CAROLYN W. COLVIN,)	OF 21 DAYS FOR DEFENDANT’S
Acting Commissioner of Social Security,)	RESPONSE TO PLAINTIFF’S MOTION
17 Defendant.)	FOR SUMMARY JUDGMENT
18)	

19
 20 Defendant, through her counsel of record, moves for an extension of time of an additional
 21 21 days to respond to Plaintiff’s motion for summary judgment. This is the second continuance
 22 sought by Defendant. The current due date is May 26, 2017. The new due date will be June 16,
 23 2017.

24 There is good cause for this request. Since the filing of Plaintiff’s motion for summary
 25 judgment, in the last few days, Defendant’s counsel has come down with flu-like symptoms
 26 which will keep her from filing Defendant’s response to Plaintiff’s Motion for Summary
 27 Judgment timely. Furthermore, in the next few weeks, Defendant’s counsel has pre-approved
 28 leave and a continuing full workload of about seven pending District Court briefs and one district

1 court hearing to address. Therefore, Defendant is respectfully requesting additional time up to
2 and including June 16, 2017, to fully review the record and research the issues presented by
3 Plaintiff's motion for summary judgment, as Defendant's counsel recovers from her sickness and
4 addresses her workload. This request is made in good faith with no intention to unduly delay the
5 proceedings.

6 Defendant moves that the Court's Scheduling Order shall be modified accordingly.

7 On May 23, 2017, Defendant reached out to Plaintiff through his counsel Steven Rosales
8 of Law Offices of Lawrence D. Rohlfing, and Plaintiff through his counsel confirmed on May
9 24, 2017 that he had no objection to the motion.

10
11 Respectfully submitted,

12 Date: May 24, 2017

13 PHILLIP A. TALBERT
United States Attorney

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

17 Attorneys for Defendant

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19 ORDER

20 APPROVED AND SO ORDERED:

21
22 Dated: May 25, 2017

23 
24 **CRAIG M. KELLISON**
25 UNITED STATES MAGISTRATE JUDGE
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