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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.)	STIPULATION AND ORDER FOR AN
16 NANCY A. BERRYHILL,)	EXTENSION OF TIME OF 14 DAYS FOR
Acting Commissioner of Social Security,)	DEFENDANT’S RESPONSE TO
17 Defendant.)	PLAINTIFF’S MOTION FOR SUMMARY
)	JUDGMENT

19
 20 IT IS HEREBY STIPULATED, by and between the parties, through their respective
 21 counsel of record, that Defendant shall have an extension of time of an additional 14 days to
 22 respond to Plaintiff’s motion for summary judgment. This is the third continuance sought by
 23 Defendant. The current due date is June 16, 2017. The new due date will be June 30, 2017.

24 There is good cause for this request. Since the Court’s order of extension dated May 25,
 25 2017, Defendant’s counsel has been recovering from and diligently addressing a backlog of cases
 26 and her full workload after her absence from sickness with flu-like symptoms and pre-approved
 27 leave. Furthermore, Defendant’s counsel continues to have a full workload in the next couple of
 28 weeks and beyond, specifically including one district court oral argument and an Equal

1 Employment Opportunity Commission matter involving discovery that was just assigned to
2 Defendant's counsel this week as an emergency and that could not be assigned to another
3 attorney. Therefore, Defendant is respectfully requesting additional time up to and including
4 June 30, 2017, to fully review the record and research the issues presented by Plaintiff's motion
5 for summary judgment, as Defendant's counsel prioritizes this case amongst her new and
6 unanticipated pressing immediate deadlines. This request is made in good faith with no intention
7 to unduly delay the proceedings.

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

10 Respectfully submitted,

11 Date: June 14, 2017

LAW OFFICES OF LAWRENCE D. ROHLFING

12 s/ Steven G. Rosales by C.Chen*
13 (As authorized by e-mail on 6/14/2017)
14 STEVEN G. ROSALES
Attorneys for Plaintiff

15 Date: June 14, 2017

16 PHILLIP A. TALBERT
United States Attorney

17 By s/ Carolyn B. Chen
18 CAROLYN B. CHEN
19 Special Assistant U. S. Attorney

20 Attorneys for Defendant

21 ORDER

22 APPROVED AND SO ORDERED:

23 Dated: June 16, 2017

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