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8 Attorneys for Defendant

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

13 CHARLES V. MITCHELL,) Case No.: 2:16-cv-00970-EFB
 14)
 Plaintiff,) STIPULATION AND ~~PROPOSED~~ ORDER
 15) FOR AN EXTENSION OF TIME
 vs.)
 16)
 17 NANCY A. BERRYHILL,)
 Acting Commissioner of Social Security,)
 18)
 19 Defendant.)

20
 21 IT IS HEREBY STIPULATED, by and between the parties, through their respective
 22 counsel of record, that the time for responding to Plaintiff’s Motion for Summary Judgment be
 23 extended by 30 days from April 3, 2017, to May 3, 2017. This is Defendant’s first request for an
 24 extension of time to respond to Plaintiff’s motion. Defendant respectfully requests this
 25 additional time because of workload issues, including the unavoidable transfer of assignments
 26 and a high volume of other disability matters in federal district court.

27 The parties further stipulate that the Court’s Scheduling Order shall be modified
 28 accordingly.

1 Counsel apologizes to the Court for any inconvenience caused by this delay.

2
3 Respectfully submitted,

4 Dated: March 30, 2017

/s/ Steven G. Rosales
STEVEN G. ROSALES
(*By email authorization on 3/30/17)
Attorney for Plaintiff

7 Dated: March 30, 2017

8 BENJAMIN B. WAGNER
United States Attorney
9 DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
10 Social Security Administration

11 By: /s/ Michael K. Marriott
12 MICHAEL K. MARRIOTT
Special Assistant U.S. Attorney
13 Attorneys for Defendant
14

15
16 ORDER

17
18 APPROVED AND SO ORDERED.

19
20 Dated: April 3, 2017.


EDMUND F. BRENNAN
UNITED STATES MAGISTRATE JUDGE