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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

DAVID IRVING APEL,)	Case No: 2:16-cv-01022-EFB
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	FOR AN EXTENSION OF TIME
vs.)	
)	
CAROLYN W. COLVIN,)	
Acting Commissioner of Social Security,)	
)	
Defendant.)	

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that Defendant's time for responding to Plaintiff's Motion for Summary Judgment be extended for 45 days from January 19, 2017 to March 6, 2017. This is Defendant's first request for an extension of time to respond to Plaintiff's motion.

Defendant requests this extension due to her attorney's inordinately heavy caseload in January 2017 through February 2017, including an appellate brief before the United States Court of Appeals for the Ninth Circuit and 30 other District Court cases, in a variety of stages, seven of which require imminent briefing in the next three weeks. Defendant's counsel is also assisting

1 an active employment case before the Equal Employment Opportunity Commission that is in the
2 midst of the discovery process and requires responding to Complainant's Request for
3 Interrogatories, Admission and Production of Documents by January 23, 2017. Defendant's
4 counsel respectfully requests this additional time to respond to Plaintiff's arguments.

5 The parties further stipulate that all subsequent deadlines set forth in the Court's
6 Scheduling Order shall be extended accordingly.

7 The parties stipulate in good faith, with no intent to prolong proceedings unduly.

8
9 Respectfully submitted,

10 Dated: January 17, 2017

/s/ Joseph Fraulob*

(* As authorized via email on January 17, 2017)

JOSEPH FRAULOB

12 Attorney for Plaintiff

13
14 Dated: January 17, 2017

PHILLIP A. TALBERT

United States Attorney

DEBORAH LEE STACHEL

Regional Chief Counsel, Region IX

Social Security Administration

18 By: /s/ Timothy R. Bolin

TIMOTHY R. BOLIN

Special Assistant United States Attorney

Attorneys for Defendant

21 Of Counsel to Defendant:
22 BEATRICE NA
23 Assistant Regional Counsel

24 ORDER

25 APPROVED AND SO ORDERED.

26
27 Dated: January 23, 2017.



THE HONORABLE EDMUND F. BRENNAN
United States Magistrate Judge