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	Attorneys for Defendant		
9		DISTRICT COURT	
10	UNITED STATES DISTRICT COURT		
10	EASTERN DISTRICT OF CALIFORNIA		
11	SACRAMENTO DIVISION		
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12			
13		) Case No.: 2:16-cv-01025-AC	
14	LAURA J. JOHNSON,	)	
14	Plaintiff,	STIPULATION AND PROPOSED ORDER	
15		) FOR AN EXTENSION OF TIME	
	vs.	)	
16	CAROLYN W. COLVIN,		
17	Acting Commissioner of Social Security,		
17			
18	Defendant.		
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19			

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that Defendant shall have an extension of time to April 3, 2017 to respond to Plaintiff's opening brief. This is Defendant's first request for an extension of time. Defendant's counsel did not realize that Plaintiff had filed her opening brief and apologizes for the delay in submitting the brief or an extension request by the due date, March 1, 2017.

This request is made in good faith with no intention to unduly delay the proceedings.

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

Stipulation and Proposed Order for Extension of Time; 2:16-cv-01025-AC

1	Counsel apologizes to the Cou	ırt for	any inconvenience caused by this delay.
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3			Respectfully submitted,
4	Dated: March 23, 2017		/s/ Robert Weems by Chantal R. Jenkins*
5			Robert Weems As authorized <i>via</i> email by Robert Weems
6			on March 23, 2017 Attorney for Plaintiff
7			
8	Dated: March 23, 2017		PHILLIP A. TALBERT
9			United States Attorney DEBORAH LEE STACHEL
10			Regional Chief Counsel, Region IX Social Security Administration
11 12			Social Security Administration
12		By:	/s/ Chantal R. Jenkins
13			CHANTAL R. JENKINS Special Assistant United States Attorney
15			Speerar rissistant ennea States rationey
16			ORDER
17			
18	APPROVED AND SO ORDERED:		
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20	Dated: March 27, 2017		auson Clane
21			ALLISON CLAIRE
22			UNITED STATES MAGISTRATE JUDGE
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24			
25			
26			
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28			
	Stipulation and Proposed Order for Extension	n of Tir	ne; 2:16-cv-01025-AC
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