

1 PHILLIP A. TALBERT  
 Acting United States Attorney  
 2 DEBORAH LEE STACHEL  
 Regional Chief Counsel, Region IX  
 Social Security Administration  
 4 SHARON LAHEY (CBSN 263027)  
 Special Assistant United States Attorney  
 5 160 Spear Street, Suite 800  
 San Francisco, California 94105  
 Telephone: (415) 977-8963  
 7 Facsimile (415) 744-0134  
 E-Mail: sharon.lahey@ssa.com  
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9 Attorneys for DEFENDANT

10 UNITED STATES DISTRICT COURT  
 11 EASTERN DISTRICT OF CALIFORNIA  
 12 SACRAMENTO DIVISION

|   |   |                                |
|---|---|--------------------------------|
| 13 ROWLAND GENE PERRY,                  | ) | Case No.: 2:16-cv-01116-AC     |
| 14                                      | ) |                                |
| 15 Plaintiff,                           | ) | STIPULATION AND PROPOSED ORDER |
| 16                                      | ) | FOR EXTENSION OF TIME          |
| 17 vs.                                  | ) |                                |
| 18                                      | ) |                                |
| 19 NANCY A. BERRYHILL,                  | ) |                                |
| Acting Commissioner of Social Security, | ) |                                |
| 20 Defendant.                           | ) |                                |

21 IT IS HEREBY STIPULATED, by and between the parties, through their respective  
 22 counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary  
 23 Judgment be extended by 30 days. The current deadline is April 19, 2017, and the new deadline  
 24 will be May 19, 2017. Any reply shall be due on or before June 2, 2017. This is Defendant's  
 25 second request for an extension of time and the sixth request for an extension of time in the  
 26 above-captioned matter. Defense counsel requests this additional time so that she may continue  
 to consider the possible settlement of this matter without further briefing by the parties.

27 ////  
 28 ////

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

2 Dated: April 18, 2017

Respectfully submitted,

3 GERI N. KAHN

4 By: /s/ Geri N. Khan

5 GERI N. KAHN

6 (As authorized by email on April 18, 2017)

7 PHILLIP A. TALBERT

Acting United States Attorney

8 DEBORAH LEE STACHEL

9 Regional Chief Counsel, Region IX

Social Security Administration

10 By: /s/ Sharon Lahey

11 SHARON LAHEY

12 Special Assistant U.S. Attorney

13  
14 **ORDER**

15 Good cause appearing, and pursuant to stipulation, it is approved and so ORDERED.

16 Defendant shall respond to Plaintiff's Motion for Summary Judgment on or before May 19,  
17 2017. Any reply shall be due on or before June 2, 2017.

18  
19 Dated: April 19, 2017

20 

21 ALLISON CLAIRE

22 UNITED STATES MAGISTRATE JUDGE