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

14 RAY JACHIN WINKELMAN,)	Case No. 2:16-cv-01126-AC
)	
15 Plaintiff,)	JOINT STIPULATION AND PROPOSED
)	ORDER FOR AN EXTENSION OF TIME
16 vs.)	
)	
17 NANCY A. BERRYHILL,)	
18 Acting Commissioner of Social Security,)	
)	
19 Defendant.)	

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 21 IT IS HEREBY STIPULATED, by and between the parties, through their respective
 22 counsel of record, that Defendant’s time for responding to Plaintiff’s Motion for Summary
 23 Judgment be extended from July 14, 2017 to August 30, 2017. This is Defendant’s first request
 24 for an extension of time to respond to Plaintiff’s Motion for Summary Judgment.

25 Defendant requests this extension due to her counsel’s heavy workload. Defendant’s
 26 counsel is responsible for an appellate brief for a Social Security case in the United States Court
 27 of Appeals for the Ninth Circuit, discovery in two personnel-related litigations pending before
 28 the Equal Employment Opportunity Commission (EEOC), and over 40 cases in the United States

1 District Courts for the Northern District, Eastern District, Central District, and Southern District
2 of California, and District of Nevada. Defendant's counsel respectfully requests this time to
3 review the Administrative Record, and to evaluate and respond to issues Plaintiff raises in his
4 motion.

5 The parties further stipulate that all subsequent deadlines shall be extended accordingly.

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

7 Respectfully submitted,

8 Dated: July 12, 2017

/s/ Beatrice Na for Robert C. Weems*

(* As authorized via email on July 12, 2017)

9 ROBERT C. WEEMS

10 Attorney for Plaintiff

11 Dated: July 12, 2017

PHILLIP A. TALBERT

12 United States Attorney

13 By: /s/ Beatrice Na

14 BEATRICE NA

15 Special Assistant United States Attorney

16 Attorneys for Defendant

17
18
19
20 ORDER

21 APPROVED AND SO ORDERED:

22 Dated: July 13, 2017

23
24 
25 ALLISON CLAIRE
26 UNITED STATES MAGISTRATE JUDGE
27
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