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11 **UNITED STATES DISTRICT COURT**
12 **EASTERN DISTRICT OF CALIFORNIA - SACRAMENTO**

13 ASHOT SHIBOYAN,
14 Plaintiff,

15 v.

16 NANCY A. BERRYHILL,
17 Acting Commissioner of Social
18 Security,
19 Defendant.

) Case No. 2:16-cv-01152-KJN

) **UNOPPOSED MOTION FOR SECOND**
) **EXTENSION OF TIME; ORDER**

19 IT IS HEREBY STIPULATED, by and between Ashot Shiboyan (Plaintiff) and
20 Nancy A. Berryhill, Acting Commissioner of Social Security (Defendant), by and
21 through their respective counsel of record, that Defendant shall have an extension of
22 time of ten (10) days to file her Opposition to Plaintiff's Opening Brief. The current due
23 date is November 13, 2017. The new date will be November 27, 2017, although
24 Defendant hopes to file the brief before that date. An extension of time is needed
25 because the attorney responsible for briefing is still working through a backlog of cases
26

1 due to having been out on medical leave. The office is extremely busy at this time,
2 particularly with the approaching holidays, such that her cases cannot be transferred.
3 This request is made in good faith with no intention to unduly delay the proceedings.

4 The parties further stipulate that the Court's Scheduling Order shall be modified
5 accordingly, such that Plaintiff's reply brief shall be due December 18, 2017.

6 Respectfully submitted,

7 Date: November 8, 2017

8 By: /s/ Geri Nadine Kahn*

9 GERI NADINE KAHN

10 Attorney for Plaintiff

(*As authorized by e-mail on November 8, 2017)

11 Date: November 8, 2017

12 PHILLIP A. TALBERT

13 United States Attorney

14 /s/ Gina Tomaselli

15 GINA TOMASELLI

16 Special Assistant United States Attorney

17 Attorneys for Defendant

18 **ORDER**

19 GOOD CAUSE APPEARING, PURSUANT TO STIPULATION, IT IS SO
20 ORDERED. DEFENDANT SHALL FILE HER OPPOSITION TO PLAINTIFF'S
21 OPENING BRIEF ON OR BEFORE NOVEMBER 27, 2017. PLAINTIFF'S
22 OPTIONAL REPLY BRIEF SHALL BE DUE DECEMBER 18, 2017.

23 Dated: November 13, 2017

24 
25 _____
26 KENDALL J. NEWMAN
UNITED STATES MAGISTRATE JUDGE