| 1<br>2<br>3<br>4<br>5<br>6<br>7  | PHILIP A. TALBERT<br>United States Attorney<br>DEBORAH LEE STACHEL<br>Regional Chief Counsel, Region IX<br>Social Security Administration<br>MICHAEL K. MARRIOTT, CSBN 280890<br>Special Assistant United States Attorney<br>160 Spear Street, Suite 800<br>San Francisco, California 94105<br>Telephone: (415) 977-8985<br>Facsimile: (415) 774-0134<br>E-Mail: Michael.Marriott@ssa.gov   |  |  |
|--|---|--|--|
| 8  | UNITED STATES DISTRICT COURT  |  |  |
| 9  | EASTERN DISTRICT OF CALIFORNIA  |  |  |
| 10   |   |  |  |
| 11   | SACRAMENTO DIVISION   |  |  |
| 12   | JASMINE SUZI INTHARINH, ) Civil No. 2:16-cv-01236-CMK   |  |  |
| 13<br>14   | Plaintiff,<br>) STIPULATION AND ORDER FOR A<br>) FIRST EXTENSION OF TIME FOR  |  |  |
| 14   | v. ) DEFENDANT TO FILE HER MSJ  |  |  |
| 16<br>17<br>18   | NANCY A. BERRYHILL, )<br>Acting Commissioner of Social Security, )<br>Defendant. )  |  |  |
| <ol> <li>19</li> <li>20</li> <li>21</li> <li>22</li> <li>23</li> <li>24</li> <li>25</li> <li>26</li> <li>27</li> </ol> | IT IS HEREBY STIPULATED by the parties, and with the approval of the Court, that<br>Defendant shall have a first extension of time of 30 days to file her MSJ. Defendant respectfully<br>requests this additional time because of a very heavy workload, including a Ninth Circuit merits<br>brief that must be completed by the end of this week. This additional time will allow Defendant<br>to properly consider the lengthy administrative record (800+ pages), as well as Plaintiff's<br>contentions. |  |  |
| 27   |   |  |  |
|  | 1   |  |  |

| 1  | Stip. to Extend Def.'s MSJ   |     |   |  |
|----|--|-----|---|--|
| 2  | The new due date for Defendant's MSJ will be Wednesday, May 3, 2017. |     |   |  |
| 3  |  |     | Respectfully submitted,   |  |
| 4  | Date: April 24, 2017   | By: | /s/ Young Chul Cho*   |  |
| 5  | Date. <u>April 24, 2017</u>  | Dy. | YOUNG CHUL CHO  |  |
| 6  |  |     | * <i>By email authorization on April 24, 2017</i><br>Attorney for Plaintiff |  |
| 7  |  |     |   |  |
| 8  | Date: <u>April 24, 2017</u>  |     | PHILIP A. TALBERT   |  |
| 9  |  |     | United States Attorney  |  |
| 10 |  | By: | <u>/s/ Michael K. Marriott</u><br>MICHAEL K. MARRIOTT                       |  |
| 11 |  |     | Special Assistant United States Attorney                                    |  |
| 12 |  |     | Attorneys for Defendant   |  |
| 13 |  |     |   |  |
| 14 |  |     |   |  |
| 15 |  |     |   |  |
| 16 |  |     |   |  |
| 17 |  |     |   |  |
| 18 |  |     | ORDER   |  |
| 19 | ADDROVED AND SO ODDEDED.   |     |   |  |
| 20 | APPROVED AND SO ORDERED:   |     | 1 1201  |  |
| 21 | Dated: April 26, 2017  |     | Loig M. Kellison  |  |
| 22 |  |     | CRAIG M. KELLISON'<br>UNITED STATES MAGISTRATE JUDGE                        |  |
| 23 |  |     |   |  |
| 24 |  |     |   |  |
| 25 | Stip. to Extend Def.'s MSJ   |     |   |  |
| 26 |  |     |   |  |
| 27 |  |     |   |  |
| 28 |  |     |   |  |
|    |  |     | 2   |  |
|    |  |     | 2   |  |