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

13	THERESA ANN UHLER,)	Case No.: 2:16-cv-01255-EFB
14	Plaintiff,)	
15	vs.)	STIPULATION FOR AN EXTENSION OF
16	CAROLYN W. COLVIN,)	TIME OF 2 DAYS FOR DEFENDANT'S
17	Acting Commissioner of Social Security,)	RESPONSE TO PLAINTIFF'S MOTION
18	Defendant.)	FOR SUMMARY JUDGMENT

19 IT IS HEREBY STIPULATED, by and between the parties, through their respective
 20 counsel of record, that Defendant shall have an extension of time of an additional 2 days to
 21 respond to Plaintiff's motion for summary judgment. This is the second continuance sought by
 22 Defendant. The current due date is January 17, 2017. The new due date will be January 19,
 23 2017.

24 There is good cause for this request. As stated in Defendant's previous request,
 25 Defendant requested an extension for Defendant's counsel's emergency and workload issues,
 26 including recovering and catching up on her workload from a medical emergency on Monday,
 27 October 24, 2016. In addition, Defendant's counsel was rear-ended in a car accident in
 28

1 December caused by another driver, and had to take more leave than originally anticipated to
2 recover from her injuries and returned to the office on January 9, 2017.

3 Because of the factors described above, Defendant is requesting additional time up to and
4 including January 19, 2017, to fully review the record and research the issues presented by
5 Plaintiff's motion for summary judgment, as Defendant's counsel recovers and addresses her
6 workload upon her return. This request is made in good faith with no intention to unduly delay
7 the proceedings.

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

10 Respectfully submitted,

11 Date: January 17, 2017

CAMPBELL & CLARK

12
13 s/ Robert N. Campbell by C. Chen*
(As authorized by e-mail on 1/17/2017)

14 ROBERT N. CLARK
Attorneys for Plaintiff

15 Date: January 17, 2017

16 PHILLIP A. TALBERT
United States Attorney

17 By s/ Carolyn B. Chen
18 CAROLYN B. CHEN
Special Assistant U. S. Attorney

19
20 Attorneys for Defendant

21
22 ORDER

23 APPROVED AND SO ORDERED.

24 DATED: January 20, 2017.

25 

26 HON. EDMUND F. BRENNAN
UNITED STATE MAGISTRATE JUDGE