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

| | | | |
|----|---|---|---|
| 14 | MICHAEL STANDEN, |) | Case No. 2:16-cv-01267-EFB |
| 15 | Plaintiff, |) | JOINT STIPULATION AND PROPOSED |
| 16 | vs. |) | ORDER FOR AN EXTENSION OF TIME |
| 17 | NANCY A. BERRYHILL, |) | |
| 18 | Acting Commissioner of Social Security, |) | |
| 19 | Defendant. |) | |

20
 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 April 21, 2017 to June 5, 2017. This is Defendant's first request for
 24 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 currently responsible for conducting discovery in a personnel-related litigation
 27 pending before the Equal Employment Opportunity Commission (EEOC), which required
 28 deposition of a key witness in the litigation and which further requires review of Complainant's

1 responses to agency's discovery requests and numerous documents in order to investigate the
2 relevant facts. Defendant's counsel is also responsible for an appellate brief for a Social Security
3 case in the United States Court of Appeals for the Ninth Circuit, a bankruptcy case before the
4 United States Bankruptcy Court for the Central District of California, and a representative
5 sanctions matter, in addition to at least 35 district court cases in a variety of stages.

6 Defendant's counsel respectfully requests this additional time to expend the necessary
7 time to review the 806-page record and to evaluate the issues Plaintiff raised, and to submit
8 Defendant's response to Plaintiff's motion for review by this Court.

9 The parties further stipulate that all subsequent deadlines set forth in the Court's
10 Scheduling Order shall be extended accordingly.

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

12 Respectfully submitted,

13 Dated: April 20, 2017

*/s/ Jared Walker**

(* As authorized via email on April 20, 2017)

JARED WALKER

16 Attorney for Plaintiff

17 Dated: April 20, 2017

PHILLIP A. TALBERT

United States Attorney

19 By: */s/ Beatrice Na*

BEATRICE NA

Special Assistant United States Attorney

Attorneys for Defendant

23 ORDER

24 APPROVED AND SO ORDERED.

25 Dated: April 25, 2017.



EDMUND F. BRENNAN

UNITED STATES MAGISTRATE JUDGE