

1 PHILLIP A. TALBERT
United States Attorney
2 DEBORAH LEE STACHEL, CSBN 230138
Regional Chief Counsel, Region IX
3 Social Security Administration
4 JENNIFER LEE TARN, CSBN 240609
Special Assistant United States Attorney
5 160 Spear Street, Suite 800
6 San Francisco, California 94105
7 Telephone: (415) 977-8825
8 Facsimile: (415) 744-0134
E-Mail: Jennifer.Tarn@ssa.gov
Attorneys for Defendant

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

12 ROBERT HILLIGAS,)
13 Plaintiff,) Case No. 2:16-cv-01382-CKD
14 v.) **STIPULATION FOR EXTENSION**
15 NANCY A. BERRYHILL,) **OF TIME FOR DEFENDANT TO RESPOND**
Acting Commissioner of Social Security,) **TO PLAINTIFF'S OPENING BRIEF**
16 Defendant.)

17 IT IS HEREBY STIPULATED, by and between Robert Hilligas (Plaintiff) and Nancy A.
18 Berryhill, Acting Commissioner of Social Security (Defendant), by and through their respective
19 counsel of record, that Defendant shall have an extension of time of thirty (30) days to file her
20 response to Plaintiff's opening brief. The current due date is April 14, 2017. The new date will be
21 May 15, 2017. An extension of time is needed because the attorney responsible for briefing this case
22 is still recovering from surgery.

23 This is the first extension of time request by Defendant in the above-captioned matter. The
24 parties further stipulate that the Court's Scheduling Order shall be modified accordingly. This request
25 is made in good faith with no intention to unduly delay the proceedings.
26

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

Date: April 5, 2017

Respectfully submitted,

By: /s/ Jacqueline Anna Forslund*
Jacqueline Anna Forslund
Forslund Law LLC

Attorney for Plaintiff
(*As authorized by e-mail on April 4, 2017)

Date: April 5, 2017

PHILLIP A. TALBERT
United States Attorney

/s/ Jennifer Lee Tarn
JENNIFER LEE TARN
Special Assistant United States Attorney

Attorneys for Defendant

OF COUNSEL:
GINA TOMASELLI
Assistant Regional Counsel

ORDER

GOOD CAUSE APPEARING, PURSUANT TO STIPULATION, IT IS SO ORDERED.
DEFENDANT SHALL FILE HER RESPONSE TO PLAINTIFF'S OPENING BRIEF ON OR
BEFORE MAY 15, 2017. ANY REPLY THERETO SHALL BE FILED ON OR BEFORE JUNE 5,
2017.

Dated: April 10, 2017



CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE