

1 BENJAMIN B. WAGNER  
 United States Attorney  
 2 DEBORAH LEE STACHEL  
 Regional Chief Counsel, Region IX  
 3 Social Security Administration  
 4 MICHAEL K. MARRIOTT, CSBN 280890  
 Special Assistant United States Attorney  
 5 160 Spear Street, Suite 800  
 San Francisco, California 94105  
 6 Telephone: (415) 977-8985  
 7 Facsimile: (415) 744-0134  
 E-Mail: Michael.Marriott@ssa.gov

8 Attorneys for Defendant

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

13 AHSHA PICKARD, ) Case No.: 2:16-cv-01545-JAM-CMK  
 14 )  
 Plaintiff, ) STIPULATION AND ORDER FOR AN  
 15 ) EXTENSION OF TIME  
 vs. )  
 16 )  
 17 NANCY A. BERRYHILL, )  
 Acting Commissioner of Social Security, )  
 18 )  
 19 Defendant. )

20  
 21 IT IS HEREBY STIPULATED, by and between the parties, through their respective  
 22 counsel of record, that the time for responding to Plaintiff’s Motion for Summary Judgment be  
 23 extended by 30 days from April 3, 2017, to May 3, 2017. This is Defendant’s first request for an  
 24 extension of time to respond to Plaintiff’s motion. Defendant respectfully requests this  
 25 additional time because of workload issues, including the unavoidable transfer of assignments  
 26 and a high volume of other disability matters in federal district court.

27 The parties further stipulate that the Court’s Scheduling Order shall be modified  
 28 accordingly.

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  
27  
28

Counsel apologizes to the Court for any inconvenience caused by this delay.

Respectfully submitted,

Dated: March 31, 2017

/s/ David J. Linden  
DAVID J. LINDEN  
(\*by email authorization on 3/30/17)  
Attorney for Plaintiff

Dated: March 31, 2017

BENJAMIN B. WAGNER  
United States Attorney  
DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX  
Social Security Administration

By: /s/ Michael K. Marriott  
MICHAEL K. MARRIOTT  
Special Assistant U.S. Attorney  
Attorneys for Defendant

ORDER

APPROVED AND SO ORDERED:

Dated: April 12, 2017

  
CRAIG M. KELLISON  
UNITED STATES MAGISTRATE JUDGE