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8 Attorneys for Defendant

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

13 ENRIQUE TORRES,
 14 Plaintiff,
 15 vs.
 16 NANCY A. BERRYHILL,
 Acting Commissioner of Social Security,
 17 Defendant.
 18

) Case No.: 2:16-cv-01574-EFB

) **JOINT STIPULATION AND**
) **[PROPOSED] ORDER FOR EXTENSION**
) **OF TIME FOR DEFENDANT TO FILE**
) **RESPONSE TO PLAINTIFF'S MOTION**
) **FOR SUMMARY JUDGMENT**

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 20 IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record,
 21 that the time for responding to Plaintiff's Motion for Summary Judgment be extended for four
 22 days from April 10, 2017, to **April 14, 2017**. This is Defendant's second request for extension.
 23 Good cause exists as counsel for Defendant has a pending Ninth Circuit brief to finalize and two
 24 back-to-back dispositive motions to file thereafter before the current deadline. Defendant
 25 respectfully requests additional time to respond to Plaintiff's Motion for Summary Judgment in
 26 order to adequately research and analyze the issues presented by Plaintiff. In addition,
 27 Defendant would like some additional time to explore the issues to determine if this case is

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1 suitable for remand. Defendant makes this request in good faith with no intention to unduly
2 delay the proceedings. The parties further stipulate that the Court's Scheduling Order shall be
3 modified accordingly.

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5 Respectfully submitted,

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7 Dated: April 4, 2017

/s/ *Jacqueline Forslund
(*as authorized by email on April 2, 2017)
JACQUELINE FORSLUND
Attorney for Plaintiff

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10
11 Dated: April 4, 2017

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15 By /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant U.S. Attorney
Attorneys for Defendant

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18 **ORDER**

19 APPROVED AND SO ORDERED.

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21 DATED: April 6, 2017.


EDMUND F. BRENNAN
UNITED STATES MAGISTRATE JUDGE

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