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

14 TIMESHA COLE,) Case No. 2:16-cv-01597-KJN
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 14, 2017 to May 30, 2017 (May 29, 2017 is a holiday). This is
24 Defendant's first request for an extension of time to respond to Plaintiff's Motion for Summary
25 Judgment.

26 Defendant requests this extension due to her counsel's heavy workload. Defendant's
27 counsel is currently responsible for conducting discovery in a personnel-related litigation
28 pending before the Equal Employment Opportunity Commission (EEOC), which requires review

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

7 Defendant's counsel respectfully requests this additional time to expend the necessary
8 time to review the 644-page record and to evaluate the issues Plaintiff raised, and to submit
9 Defendant's response to Plaintiff's motion for review by this Court.

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

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

13 Respectfully submitted,

14 Dated: April 11, 2017

15 /s/ Kelsey Brown*
16 (* As authorized via email on April 11, 2017)
17 KELSEY BROWN

18 Attorney for Plaintiff

19 Dated: April 11, 2017

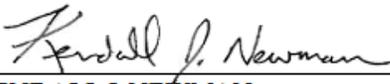
20 PHILLIP A. TALBERT
21 United States Attorney

22 By: /s/ Beatrice Na
23 BEATRICE NA
24 Special Assistant United States Attorney
25 Attorneys for Defendant

26 ORDER

27 APPROVED AND SO ORDERED:

28 Dated: April 17, 2017


KENDALL J. NEWMAN
UNITED STATES MAGISTRATE JUDGE