

1 PHILLIP A. TALBERT
United States Attorney
2 DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
3 Social Security Administration
4 CAROLYN B. CHEN, CSBN 256628
Special Assistant United States Attorney
5 160 Spear Street, Suite 800
San Francisco, California 94105
6 Telephone: (415) 977-8956
7 Facsimile: (415) 744-0134
E-Mail: Carolyn.Chen@ssa.gov
8 Attorneys for Defendant

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

12
13 CONNIE LYNNE GUMMESON,) Case No.: 2:16-cv-01611-CKD
14 Plaintiff,)
15 vs.) STIPULATION AND ORDER FOR AN
16 CAROLYN W. COLVIN,) EXTENSION OF TIME OF 35 DAYS FOR
Acting Commissioner of Social Security,) DEFENDANT’S RESPONSE TO
17 Defendant.) PLAINTIFF’S MOTION FOR SUMMARY
18) JUDGMENT

19
20 IT IS HEREBY STIPULATED, by and between the parties, through their respective
21 counsel of record, that Defendant shall have an extension of time of an additional 35 days to
22 respond to Plaintiff’s motion for summary judgment. This is the second continuance sought by
23 Defendant. The current due date is March 3, 2017. The new due date will be April 7, 2017.

24 There is good cause for this request. Since Defendant’s previous request, Defendant’s
25 counsel has been diligent in addressing a backlog of cases and heavy workload due to her
26 multiple-weeks long absences after two medical emergencies. In the last week, she also
27 experienced an unanticipated mild medical condition that affected her ability to work and
28 required her to be on leave. Despite her diligence and given counsel’s heavy workload in the

1 next month, Defendant is requesting additional time up to and including April 7, 2017, to fully
2 review the record and research the issues presented by Plaintiff's motion for summary judgment.
3 This request is made in good faith with no intention to unduly delay the proceedings.

4 The parties further stipulate that the Court's Scheduling Order shall be modified
5 accordingly.

6 Respectfully submitted,

7 Date: March 6, 2017

PEÑA & BROMBERG, PLC

8 *s/ Jonathan O. Peña by C.Chen**
9 (As authorized by e-mail on 3/6/2017)
10 JONATHAN O. PEÑA, ESQ.
11 Attorneys for Plaintiff

12 Date: March 6, 2017

PHILLIP A. TALBERT
United States Attorney

13 By *s/ Carolyn B. Chen*
14 CAROLYN B. CHEN
15 Special Assistant U. S. Attorney

16 Attorneys for Defendant

17
18 ORDER

19 APPROVED AND SO ORDERED:

20 Dated: March 9, 2017

21 
22 _____
23 CAROLYN K. DELANEY
24 UNITED STATES MAGISTRATE JUDGE
25
26
27
28