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Attorney for Plaintiff

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION**

11	CONNIE LYNN GUMMESON,	)	Case No.: 2:16-CV-01611-CKD
12	Plaintiff,	)	STIPULATION AND ORDER FOR AN
13	vs.	)	EXTENSION OF TIME FOR PLAINTIFF TO
14		)	FILE HER REPLY BRIEF
15	NANCY A. BERRYHILL,	)	
16	Acting Commissioner of Social Security,	)	
17	Defendant.	)	

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IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that Plaintiff shall have a short extension of time of seven (7) days to respond to Defendant's Response to Plaintiff's Motion for Summary Judgment. This is Plaintiff's first request for extension to file her Reply Brief. Plaintiff's Reply Brief is currently due on April 28, 2017; if this request is granted, Plaintiff's Reply Brief will be due on May 5, 2017.

There is good cause for this request. Plaintiff's counsel has long been committed to two events in the last week of April and first week of May, the first of which requires him to travel to

1 Florida and the second to Minnesota. In anticipation, Plaintiff's counsel has been diligently  
2 reviewing, drafting and finalizing the memoranda and pleadings that are due during this time.  
3 Defendant submitted its brief on April 10; while Plaintiff's counsel has reviewed the brief and  
4 intends to file a reply, Plaintiff's counsel believes that the complexities of the matter require him  
5 to devote additional time to the Reply brief in order to fully present the issues to the Court. This  
6 is unfeasible due to Plaintiff's counsel's travel and training schedule; as such, Plaintiff  
7 respectfully requests a short extension in order to present a comprehensive and fully developed  
8 Reply. This request is made in good faith and with no intention to unduly delay the proceedings.  
9

10 The parties further stipulate that the Court's Scheduling Order shall be modified  
11 accordingly.  
12

13 Respectfully submitted,

14 Dated: April 26, 2017

15 /s/ Jonathan Omar Pena  
16 JONATHAN OMAR PENA  
17 Law Office of Jonathan O. Pena  
18 Attorney for Plaintiff

19 Dated: April 26, 2017

20 PHILLIP A. TALBERT  
21 United States Attorney  
22 DEBORAH LEE STACHEL  
23 Acting Regional Chief Counsel, Region IX,  
24 Social Security Administration

25 By: /s/ Carolyn B. Chen  
26 (\*as authorized by email on 4/25/17)  
27 CAROLYN B. CHEN  
28 Special Assistant U.S. Attorney  
Attorneys for Defendant

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**ORDER**

APPROVED AND SO ORDERED:

Dated: April 27, 2017



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CAROLYN K. DELANEY  
UNITED STATES MAGISTRATE JUDGE