

1 when she returned to work in November. In addition, on December 9, 2016, Defendant's
2 counsel was rear-ended in a car accident caused by another driver. Between the December
3 accident and the current date, Defendant's counsel had taken about three weeks of leave to
4 recover and rest, and returned to the office on January 9, 2017. In addition to her existing
5 workload when she returned, new emergency assignments had been assigned to Defendant's
6 counsel this past week that cannot be reassigned to another attorney and prevent Defendant's
7 counsel from meeting the original deadline of February 6, 2017.

8 Because of the factors described above, Defendant is requesting additional time up to and
9 including February 21, 2017, to fully review the record and research the issues presented by
10 Plaintiff's motion for summary judgment, as Defendant's counsel continues to recover and
11 address her workload. This request is made in good faith with no intention to unduly delay the
12 proceedings.

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

15 Respectfully submitted,

16 Date: February 6, 2017

LAW OFFICE B. MARIE RIZZO

17
18 s/ Barbara M. Rizzo by C. Chen*
(As authorized by e-mail on 2/4/2017)
19 BARBARA M. RIZZO
Attorneys for Plaintiff

20 Date: February 6, 2017

21 PHILLIP A. TALBERT
United States Attorney

22 By s/ Carolyn B. Chen
23 CAROLYN B. CHEN
24 Special Assistant U. S. Attorney

25 Attorneys for Defendant
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ORDER

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APPROVED AND SO ORDERED:

Dated: February 10, 2017


CRAIG M. KELLISON
UNITED STATES MAGISTRATE JUDGE