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8 Attorneys for Defendant

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

13 LEWIS S. CANE, ) Case No.: 2:16-cv-01699-KJN  
14 )  
Plaintiff, ) STIPULATION AND ~~PROPOSED~~ ORDER  
15 ) FOR AN EXTENSION OF TIME  
vs. )  
16 NANCY A. BERRYHILL, )  
Acting Commissioner of Social Security, )  
17 )  
18 Defendant. )

19  
20 IT IS HEREBY STIPULATED, by and between the parties, through their respective  
21 counsel of record, that Defendant shall have a one-week extension of time to April 19, 2017 to  
22 respond to Plaintiff's opening brief. Defendant's counsel was recently reassigned this case, and  
23 requests this additional time to familiarize herself with the record and draft the Commissioner's  
24 responsive brief.

25 This request is made in good faith with no intention to unduly delay the proceedings.

26 The parties further stipulate that the Court's Scheduling Order shall be modified  
27 accordingly.  
28

1 Counsel apologizes to the Court for any inconvenience caused by this delay.

2  
3 Respectfully submitted,

4 Dated: April 12, 2017

/s/ Jesse S. Kaplan by Chantal R. Jenkins\*  
JESSE S. KAPLAN  
As authorized *via* email by Jesse S. Kaplan  
on April 12, 2017  
Attorney for Plaintiff

5  
6  
7  
8 Dated: April 12, 2017


9 PHILLIP A. TALBERT  
United States Attorney  
10 DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX  
11 Social Security Administration

12  
13 By: /s/ Chantal R. Jenkins  
14 CHANTAL R. JENKINS  
Special Assistant United States Attorney

15  
16  
17 ORDER

18 APPROVED AND SO ORDERED:

19  
20 Dated: April 17, 2017

21  
22   
23 KENDALL J. NEWMAN  
UNITED STATES MAGISTRATE JUDGE