1 2 3 4 5 6 7	PHILLIP A. TALBERT United States Attorney DEBORAH LEE STACHEL Regional Chief Counsel, Region IX Social Security Administration TINA L. NAICKER, CSBN 252766 Special Assistant United States Attorney 160 Spear Street, Suite 800 San Francisco, California 94105 Telephone: (415) 268-5611 Facsimile: (415) 744-0134 E-Mail: Tina.Naicker@SSA.gov		
8	Attorneys for Defendant		
9	UNITED STATES DISTRICT COURT		
10	EASTERN DISTRICT OF CALIFORNIA		
11	SACRAMENTO DIVISION		
12		Case No.: 2:16-CV-01987-CKD	
13	ALLI K. OLSON,		
14	Plaintiff,	 STIPULATION AND ORDER FOR EXTENSION OF TIME FOR DEFENDANT TO FILE RESPONSE TO PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT 	
15	VS.		
16	CAROLYN W. COLVIN, Acting Commissioner of Social Security,	JUDGMENT	
17	Defendant.		
18)		
19			
20	IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record,		
21	that the time for responding to Plaintiff's Motion for Summary Judgment be extended for thirty-		
22	five (35) days from February 27, 2017, to April 3, 2017 due to current workload demands. This		
23	is Defendant's first request for extension. Good cause exists as counsel for Defendant has a 9 th		
24	Circuit brief due at/around the same time as the current deadline and counsel has two other briefs		
25	due on the same date as the current deadline. Defendant respectfully requests additional time to		
26	respond to Plaintiff's Motion for Summary Judgment in order to adequately research and analyze		
27	the issues presented by Plaintiff. Defendant makes this request in good faith with no intention to		
28	unduly delay the proceedings.		
	Joint Stipulation for Extension of Time; 2:16-CV-01987-CKD		
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1	The parties further stipulate that the Court's Scheduling Order shall be modified	
2	accordingly.	
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4		Respectfully submitted,
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6	Dated: February 23, 2017	/s/*Cyrsu Safa (*as authorized by email on February 23, 2017)
7		CYRUS SAFA Attorney for Plaintiff
8		Autorney for Framum
9		
10	Dated: February 23, 2017	PHILLIP A. TALBERT United States Attorney
11		DEBORAH LEE STÄCHEL Regional Chief Counsel, Region IX
12		Social Security Administration
13		
14		By <u>/s/ Tina L. Naicker</u> TINA L. NAICKER
15		Special Assistant U.S. Attorney
16		Attorneys for Defendant
17		
18		<u>ORDER</u>
19	APPROVED AND SO ORDERED:	
20		
21	Dated: February 28, 2017	Caroh a. Delany
22		CAROLYN K. DELANEY
23		UNITED STATES MAGISTRATE JUDGE
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