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8 Attorneys for Defendant

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

13 ALLI K. OLSON,) Case No.: 2:16-CV-01987-CKD
14 Plaintiff,)
15 vs.) **STIPULATION AND ORDER FOR**
16 CAROLYN W. COLVIN,) **EXTENSION OF TIME FOR**
Acting Commissioner of Social Security,) **DEFENDANT TO FILE RESPONSE TO**
17 Defendant.) **PLAINTIFF'S MOTION FOR SUMMARY**
18) **JUDGMENT**

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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 from April
22 3, 2017 to **May 12, 2017** due to current workload demands. This is Defendant's second request
23 for extension. Good cause exists to grant Defendant's request for extension. Additional time is
24 required as counsel for Defendant has over 45+ active matters, of which five dispositive motions
25 are required on or before the current deadline, including Defendant's opening brief before the
26 Ninth Circuit. Due to scheduling conflicts, counsel for Defendant needs additional time to
27 complete the agency's review process and U.S. Attorneys' process for the Ninth Circuit brief.
28 Additionally, counsel for Defendant was recently assigned a document review matter that

Joint Stipulation for Extension of Time; 2:16-CV-01987-CKD

1 requires immediate attention. Defendant respectfully requests additional time to respond to
2 Plaintiff's Motion for Summary Judgment in order to adequately research, analyze and respond
3 to the issues presented by Plaintiff. Defendant makes this request in good faith with no intention
4 to unduly delay the proceedings. Defendant will diligently meet the new deadline. The parties
5 further stipulate that the Court's Scheduling Order shall be modified accordingly.

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7 Respectfully submitted,

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9 Dated: March 30, 2017

/s/ *Cyrus Safa
(*as authorized by email on March 30, 2017)
CYRUS SAFA
Attorney for Plaintiff

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13 Dated: March 30, 2017

PHILLIP A. TALBERT
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17 By /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant U.S. Attorney
Attorneys for Defendant

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21 **ORDER**

22 APPROVED AND SO ORDERED:

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24 Dated: April 3, 2017


CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE