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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 for two  
22 weeks from May 12, 2017 to May 26, 2017. This is Defendant's third request for extension.  
23 Good cause exists to grant Defendant's request for extension. Additional time is required  
24 because counsel for Defendant had an emergency family matter earlier this week that required  
25 counsel for Defendant to take unscheduled leave. Defendant respectfully requests additional  
26 time to respond to Plaintiff's Motion for Summary Judgment in order to adequately research,  
27 analyze and respond to the issues presented by Plaintiff. Defendant makes this request in good  
28 faith with no intention to unduly delay the proceedings. Defendant will diligently meet the new

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

1 deadline. 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: May 11, 2017

/s/ \*Cyrus Safa  
(\*as authorized by email on May 11, 2017)  
CYRUS SAFA  
Attorney for Plaintiff

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10 Dated: May 11, 2017

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

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14 By /s/ Tina L. Naicker  
TINA L. NAICKER  
Special Assistant U.S. Attorney  
Attorneys for Defendant

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18 **ORDER**

19 APPROVED AND SO ORDERED:

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21 Dated: May 15, 2017

  
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CAROLYN K. DELANEY  
UNITED STATES MAGISTRATE JUDGE