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8 Attorneys for Defendant

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

12
13 JOSEPH B. TRIPLETT,) Case No.: 2:16-cv-02168-KJN
14 Plaintiff,)
15 vs.) STIPULATION AND ~~PROPOSED~~ ORDER
16 CAROLYN W. COLVIN,) FOR AN EXTENSION OF TIME OF 35
Acting Commissioner of Social Security,) DAYS FOR DEFENDANT’S RESPONSE TO
17 Defendant.) PLAINTIFF’S MOTION FOR SUMMARY
18) JUDGMENT

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20 IT IS HEREBY STIPULATED, by and between the parties, through their respective
21 counsel of record, that Defendant shall have an extension of time of an additional 35 days to
22 respond to Plaintiff’s motion for summary judgment. This is the first continuance sought by
23 Defendant. The current due date is March 8, 2017. The new due date will be April 12, 2017.

24 There is good cause for this request. Since the filing of Plaintiff’s motion for summary
25 judgment, Defendant’s counsel has been diligently addressing a backlog of cases and heavy
26 workload due to her multiple-weeks long absences after two major medical emergencies at the
27 end of 2016. In the last week, she also experienced an unanticipated mild medical condition that
28 affected her ability to work and required her to be on leave. Despite her diligence and given

1 counsel's continuing heavy workload in the next month, Defendant is requesting additional time
2 up to and including April 12, 2017, to fully review the record and research the issues presented
3 by Plaintiff's motion for summary judgment. This request is made in good faith with no
4 intention to unduly delay the proceedings.

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

7 Respectfully submitted,

8 Date: March 8, 2017

LAW OFFICES OF LAWRENCE D. ROHLFING

9 s/ Young Cho by C.Chen*

10 (As authorized by e-mail on 3/8/2017)

11 YOUNG CHO

Attorneys for Plaintiff

12 Date: March 8, 2017

PHILLIP A. TALBERT

United States Attorney

14 By s/ Carolyn B. Chen

15 CAROLYN B. CHEN

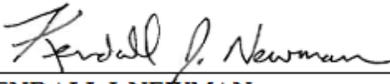
16 Special Assistant U. S. Attorney

17 Attorneys for Defendant

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19 ORDER

20 APPROVED AND SO ORDERED:

21 Dated: March 10, 2017

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24 KENDALL J. NEWMAN
25 UNITED STATES MAGISTRATE JUDGE
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