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

13 DANIEL FISCHL,) Case No.: 2:16-cv-02320-CMK
 14)
 Plaintiff,)
 15) **JOINT STUPULATION AND ORDER**
 vs.) **FOR EXTENSION OF TIME**
 16)
 17)
 NANCY A. BERRYHILL)
 18 Acting Commissioner of Social Security,)
 19)
 Defendant.)

20
 21 Defendant Nancy A. Berryhill, Acting Commissioner of Social Security (“Defendant”)
 22 respectfully requests that the Court extend the time for Defendant to file her Opposition to
 23 Plaintiff’s Motion for Summary Judgment, originally due on September 20, 2017, by 35 days,
 24 through and including Wednesday, October 25, 2017. This is the Commissioner’s first request
 25 for an extension of time in this matter.

26 An extension of time is needed in order to prepare Defendant’s opposition because
 27 counsel will be on his honeymoon for the last three weeks of September and the beginning of
 28 October, and faces a heavy caseload when he returns. This request is made in good faith with no

1 intention to unduly delay the proceedings. Counsel's office conferred with Plaintiff's counsel,
2 who had no objection to this request, on September 8, 2017.

3
4 Respectfully submitted,

5 Dated: September 8, 2017

6 PHILIP A. TALBERT
7 United States Attorney
8 DEBORAH LEE STACHEL
9 Regional Chief Counsel, Region IX
10 Social Security Administration

11 By: /s/ Adam Lazar
12 ADAM LAZAR
13 Special Assistant U.S. Attorney
14 Attorneys for Defendant

15 Dated: September 8, 2017

16 By: /s/ Jesse Kaplan*
17 JESSE KAPLAN
18 (*by email authorization)
19 Attorney for Plaintiff

20 **ORDER**

21 IT IS SO ORDERED.

22 Dated: September 11, 2017

23 
24 **CRAIG M. KELLISON**
25 UNITED STATES MAGISTRATE JUDGE
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27
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