

1 PHILLIP A. TALBERT
United States Attorney
2 DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
3 Social Security Administration
4 TINA L. NAICKER, CSBN 252766
Special Assistant United States Attorney
5 160 Spear Street, Suite 800
San Francisco, California 94105
6 Telephone: (415) 268-5611
Facsimile: (415) 744-0134
7 E-Mail: Tina.Naicker@SSA.gov

8 Attorneys for Defendant

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

12
13 LIZA JONES O/B/O AJA TERRY,
14 Plaintiff,
15 vs.
16 NANCY A. BERRYHILL,
Acting Commissioner of Social Security,
17 Defendant.
18

) Case No.: 2:16-CV-02324-CKD

) **JOINT STIPULATION AND ORDER FOR**
) **EXTENSION OF TIME FOR**
) **DEFENDANT TO RESPOND TO**
) **PLAINTIFF'S MOTION FOR SUMMARY**
) **JUDGMENT**

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 days from September 20, 2017 to **October 20, 2017**. This is Defendant's first request for
23 extension. Good cause exists to grant Defendant's request for extension. Counsel for Defendant
24 was on unexpected medical leave and became behind on her caseload. Additional time is
25 required as Counsel for Defendant has over 50 active pending matters, of which require 2+
26 responses to dispositive motions per week until mid-October. Due to current workload demands
27 and shortened staff, Counsel needs additional time to adequately review the transcript and
28 properly respond to Plaintiff's Motion for Summary Judgment. Defendant makes this request in

1 good faith with no intention to unduly delay the proceedings. The parties further stipulate that
2 the Court's Scheduling Order shall be modified accordingly.

3
4 Respectfully submitted,

5
6 Dated: September 14, 2017

/s/ *Robert C. Weems
(*as authorized by email on September 14, 2017)
ROBERT C. WEEMS
Attorney for Plaintiff

7
8
9
10 Dated: September 14, 2017

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

11
12
13
14 By /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant U.S. Attorney
Attorneys for Defendant

15
16
17 **ORDER**

18 APPROVED AND SO ORDERED:

19
20 Dated: September 15, 2017



CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE