

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

Attorneys for Defendant

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA  
SACRAMENTO DIVISION**

LIZA JONES O/B/O AJA TERRY,	)	Case No.: 2:16-cv-02324 CKD
	)	
Plaintiff,	)	<b>JOINT STIPULATION AND ORDER</b>
	)	<b>FOR EXTENSION OF TIME FOR</b>
vs.	)	<b>DEFENDANT TO RESPOND TO</b>
NANCY A. BERRYHILL,	)	<b>PLAINTIFF'S MOTION FOR SUMMARY</b>
Acting Commissioner of Social Security,	)	<b>JUDGMENT</b>
	)	
Defendant.	)	
	)	

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Summary Judgment be extended for two weeks from October 20, 2017 to **November 3, 2017**. This is Defendant's second request for extension. Good cause exists to grant Defendant's request for extension. Counsel sprained her hand and is currently on medical leave. Due to unexpected leave, additional time is required as Counsel for Defendant has over 50 active pending matters, of which require 2+ responses to dispositive motions per week. Due to current workload demands and shortened staff, Counsel needs additional time to adequately review the transcript and properly respond to Plaintiff's Motion for Summary Judgment. Counsel apologizes for the belated nature of the request, but

1 she did not expect taking unanticipated medical leave. Defendant makes this request in good  
2 faith with no intention to unduly delay the proceedings. The parties further stipulate that the  
3 Court's Scheduling Order shall be modified accordingly.

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5 Respectfully submitted,

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7 Dated: October 20, 2017

/s/ \*Robert C. Weems  
(\*as authorized by email on October 20, 2017)  
ROBERT C. WEEMS  
Attorney for Plaintiff

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10  
11 Dated: October 20, 2017

PHILLIP A. TALBERT  
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15 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: October 24, 2017

  
\_\_\_\_\_  
CAROLYN K. DELANEY  
UNITED STATES MAGISTRATE JUDGE