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8 Attorneys for Defendant

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

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13 LIZA JONES O/B/O AJA TERRY,) Case No.: 2:16-CV-02324-CKD
14 Plaintiff,)
15 vs.) **JOINT STIPULATION AND ORDER FOR**
16 NANCY A. BERRYHILL,) **EXTENSION OF TIME FOR**
Acting Commissioner of Social Security,) **DEFENDANT TO RESPOND 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 November 3, 2017 to **November 17, 2017**. This is Defendant's third request for
23 extension. Good cause exists to grant Defendant's request for extension. Counsel was on
24 intermittent medical leave due to re-injuring her sprained right hand. As a result, Counsel had to
25 take additional leave. Due to unanticipated medical leave, Counsel needs additional time as she
26 has over 60 active pending matters, of which require 2+ responses to dispositive motions per
27 week. Due to high workload demands and shortened staff due to budget constraints, Counsel
28 needs additional time to adequately review the transcript and properly respond to Plaintiff's

1 Motion for Summary Judgment. Counsel apologizes for the belated nature of the request, but
2 she did not expect taking a longer recovery period for her recent hand injury and taking
3 additional leave. Defendant makes this request in good faith with no intention to unduly delay
4 the proceedings. The parties further stipulate that the Court's Scheduling Order shall be
5 modified accordingly.

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7 Respectfully submitted,

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9 Dated: November 2, 2017

/s/ *Robert C. Weems
(*as authorized by email on November 2, 2017)
ROBERT C. WEEMS
Attorney for Plaintiff

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13 Dated: November, 2017

PHILLIP A. TALBERT
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17 By /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant U.S. Attorney
Attorneys for Defendant

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20 **ORDER**

21 APPROVED AND SO ORDERED:

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23 Dated: November 7, 2017



CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE