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8 Attorneys for Defendant

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

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

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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 one
22 weeks from November 17, 2017 to **November 24, 2017**. This is Defendant's fourth request for
23 extension. Good cause exists to grant Defendant's request for extension. Counsel is currently
24 sick and is out on leave. Due to unanticipated medical leave, Counsel needs additional time to
25 adequately review the transcript and properly respond to Plaintiff's Motion for Summary
26 Judgment. Counsel apologizes for the belated nature of the request, but she did not expect
27 taking additional leave. Defendant makes this request in good faith with no intention to unduly
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1 delay the proceedings. The parties further stipulate that the Court's Scheduling Order shall be
2 modified accordingly.

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4 Respectfully submitted,

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6 Dated: November 17, 2017

/s/ *Robert C. Weems
(*as authorized by email on November 17, 2017)
ROBERT C. WEEMS
Attorney for Plaintiff

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10 Dated: November 17, 2017

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

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17 **ORDER**

18 APPROVED AND SO ORDERED:

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20 Dated: November 20, 2017



CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE

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