

1 PHILLIP A. TALBERT
United States Attorney
2 DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
3 Social Security Administration
4 BEATRICE NA, CSBN 303390
Special Assistant United States Attorney
5 Social Security Administration
Office of the General Counsel
6 160 Spear St Ste 800
7 San Francisco, CA 94105
Telephone: (415) 977-8967
8 Facsimile: (415) 744-0134
E-mail: beatrice.na@ssa.gov
9 Attorneys for Defendant

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

14 ERICK A. MASON,) Case No. 2:16-cv-02734-CKD
15 Plaintiff,) JOINT STIPULATION AND ORDER FOR
16 vs.) AN EXTENSION OF TIME
17 NANCY A. BERRYHILL,)
18 Acting Commissioner of Social Security,)
19 Defendant.)

20
21 IT IS HEREBY STIPULATED, by and between the parties, through their respective
22 counsel of record, that Defendant's time for responding to Plaintiff's Motion for Summary
23 Judgment be extended from November 20, 2017 to December 11, 2017. This is Defendant's
24 second request for an extension of time to respond to Plaintiff's Motion for Summary Judgment.

25 Defendant requests this extension due to her counsel's heavy workload. Defendant's
26 counsel is currently responsible for conducting deposition of the Complainant in a personnel-
27 related litigation pending before the Equal Employment Opportunity Commission, and preparing
28 for a 2-day arbitration hearing that involves total of 11 witnesses taking place on November 29-

1 30, 2017. Defendant's counsel is also responsible for a Social Security appeal before the United
2 States Court of Appeals for the Ninth Circuit that is due on November 27, 2017, and over 40
3 district court cases in variety of stages, including 6 other cases that require imminent briefing.

4 Defendant's counsel respectfully requests this additional time to expend the necessary
5 time to review the record and to evaluate the issues Plaintiff raised, and to submit Defendant's
6 response for review by this Court.

7 The parties further stipulate that all subsequent deadlines set forth in the Court's
8 Scheduling Order shall be extended accordingly.

9 The parties stipulate in good faith, with no intent to prolong proceedings unduly.

10 Respectfully submitted,

11 Dated: November 16, 2017

/s/ Robert C. Weems*

(* As authorized via email on November 16, 2017)

ROBERT C. WEEMS

14 Attorney for Plaintiff

15
16 Dated: November 16, 2017

PHILLIP A. TALBERT
United States Attorney

17
18 By: /s/ Beatrice Na

BEATRICE NA

Special Assistant United States Attorney

19
20 Attorneys for Defendant

21
22 ORDER

23 APPROVED AND SO ORDERED:

24
25 Dated: November 20, 2017



26 CAROLYN K. DELANEY

27 UNITED STATES MAGISTRATE JUDGE
28