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10 **UNITED STATES DISTRICT COURT**
11 **EASTERN DISTRICT OF CALIFORNIA**

12
13 SONJA RYGG,) Case No.: 2:16-cv-02737-CKD
14 Plaintiff,)
15 vs.) **JOINT STIPULATION AND ORDER FOR**
16) **EXTENSION OF TIME**
17 NANCY A. BERRYHILL)
18 Acting Commissioner of Social Security,)
19 Defendant.)

20
21 Defendant Nancy A. Berryhill, Acting Commissioner of Social Security (“Defendant”) respectfully requests that the Court extend the time for Defendant to file her Opposition to
22 Plaintiff’s Opening Brief, originally due on July 3, 2017, by 45 days, through and including
23 Thursday, August 17, 2017. This is the Commissioner’s first request for an extension of time in
24 this matter.

25
26 An extension of time is needed in order to prepare Defendant’s opposition because
27 counsel was married on June 24, which has caused significant additional pressure on counsel’s
28 schedule. Counsel’s workload in the current two-week period further includes three summary judgment motions and multiple discovery deadlines for an Equal Employment Opportunity

1 (EEO) hearing, in addition to the brief due in this matter. This request is made in good faith with
2 no intention to unduly delay the proceedings.

3 Counsel's office conferred with Plaintiff's counsel, who had no objection to this request,
4 on June 30, 2017.

5
6 Respectfully submitted,

7 Dated: June 30, 2017

8 PHILIP A. TALBERT
9 United States Attorney
10 DEBORAH LEE STACHEL
11 Regional Chief Counsel, Region IX
12 Social Security Administration

13 By: /s/ Adam Lazar
14 ADAM LAZAR
15 Special Assistant U.S. Attorney
16 Attorneys for Defendant

17 Dated: June 30, 2017

18 By: /s/ David Linden*
19 DAVID LINDEN
20 (*by email authorization on June 30, 2017)
21 Attorney for Plaintiff

22 **ORDER**

23 IT IS SO ORDERED.

24 Dated: July 6, 2017

25 
26 _____
27 CAROLYN K. DELANEY
28 UNITED STATES MAGISTRATE JUDGE