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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 STUPULATION AND ORDER**
16) **FOR 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 a responsive pleading to Plaintiff’s opening brief, originally due on August 17, 2017, by 15 days, through and including Friday, August 31, 2017. This is the Commissioner’s second request for an extension of time in this matter.

26 A brief extension of time is needed because of the unusual and complex nature of the underlying decision complained of, including a partial award of benefits and a finding of medical improvement, which is requiring additional review by the agency. This request is made in good faith with no intention to unduly delay the proceedings.

1 Counsel's office conferred with Plaintiff's counsel, who had no objection to this request,
2 on August 11, 2017.

3
4 Respectfully submitted,

5 Dated: August 15, 2017

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

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

15 Dated: August 15, 2017

16 By: /s/ David Linden*
17 DAVID LINDEN
18 (*by email authorization on August 11, 2017)
19 Attorney for Plaintiff

20 **ORDER**

21 IT IS SO ORDERED.

22 Dated: August 16, 2017

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24 _____
25 CAROLYN K. DELANEY
26 UNITED STATES MAGISTRATE JUDGE
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