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8 Attorneys for Defendant

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

13 STEPHANIE WHEELER,  
 14 Plaintiff,  
 15 vs.  
 16 NANCY A. BERRYHILL,  
 Acting Commissioner of Social Security,  
 17 Defendant.  
 18

) Case No.: 2:16-CV-02827-AC

) **STIPULATION AND PROPOSED ORDER**  
 ) **FOR EXTENSION OF TIME FOR**  
 ) **DEFENDANT TO FILE RESPONSE TO**  
 ) **PLAINTIFF'S MOTION FOR SUMMARY**  
 ) **JUDGMENT**

19  
 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 May 30, 2017 to **June 30, 2017**. This is Defendant's first request for extension.  
 23 Good cause exists to grant Defendant's request for extension. Additional time is required  
 24 because counsel for Defendant had to take family medical leave to care for her mother who had  
 25 surgery last week. Due to unanticipated scheduled leave, counsel for Defendant did not have  
 26 sufficient time to adequately research, analyze and respond to the issues presented by Plaintiff.  
 27 Defendant respectfully requests additional time to respond to Plaintiff's Motion for Summary  
 28 Judgment. Defendant makes this request in good faith with no intention to unduly delay the

Joint Stipulation and PO for Extension of Time; 2:16-CV-02827-AC

1 proceedings. The parties further stipulate that the Court's Scheduling Order shall be modified  
2 accordingly.

3  
4 Respectfully submitted,

5  
6 Dated: May 24, 2017

/s/ \*Joshua B. Kons  
(\*as authorized by email on May 24, 2017)  
JOSHUA B. KONS  
Attorney for Plaintiff

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9  
10 Dated: May 24, 2017

PHILLIP A. TALBERT  
United States Attorney  
DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX  
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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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18 **ORDER**

19 APPROVED AND SO ORDERED:

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21  
22  
23 DATED: June 6, 2017

Allison Claire  
ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE