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9 Attorneys for Defendant

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

12 LYNNE HULSEY,	) Case No.: 2:16-CV-03057-AC
13	)
14 Plaintiff,	) STIPULATION AND <del>PROPOSED</del> ORDER
15	) FOR A FIRST EXTENSION OF 30 DAYS
16 vs.	) FOR DEFENDANT TO RESPOND TO
17 NANCY A. BERRYHILL,	) PLAINTIFF’S MOTION FOR SUMMARY
Acting Commissioner of Social Security,	) JUDGMENT AND FILE HER CROSS-
18	) MOTION FOR SUMMARY JUDGMENT
19 Defendant.	)
	)
	)

20 IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record,  
 21 that Defendant shall have a first extension of time of 30 days to respond to Plaintiff’s Motion for  
 22 Summary Judgment and file her Cross-Motion for Summary Judgment. The additional time is  
 23 requested due to Defendant’s counsel’s exceptionally heavy workload at this time, including two  
 24 employment law matters in active litigation, one pending before the pending Equal Employment  
 25 Opportunity Commission and another before the Merit Systems Protection Board. In addition,  
 26 Defendant’s counsel has seven other pending district court and Ninth Circuit cases with filing  
 27 deadlines imminent. The additional time requested is needed to adequately research the issues  
 28

1 Plaintiff has presented. The current due date is August 4, 2017. The new due date will be  
2 September 3, 2017.

3  
4 The parties further stipulate that the Court's Scheduling Order shall be modified  
5 accordingly.

6  
7 Respectfully submitted,

8 Dated: August 3, 2017

9 /s/ Josephine Gerrard  
10 (as authorized by email)  
11 JOSEPHINE GERRARD  
12 Attorney for Plaintiff

13 Dated: August 3, 2017

14 PHILLIP A. TALBERT  
15 United States Attorney  
16 DEBORAH LEE STACHEL  
17 Regional Chief Counsel, Region IX,  
18 Social Security Administration

19 By: /s/ Jennifer A. Kenney  
20 JENNIFER A. KENNEY  
21 Special Assistant U.S. Attorney  
22 Attorneys for Defendant

23 **ORDER**

24 APPROVED AND SO ORDERED:

25 DATED: August 7, 2017

26 Allison Claire  
27 ALLISON CLAIRE  
28 UNITED STATES MAGISTRATE JUDGE