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9 Attorneys for Defendant

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

12 JEFFREY P. AGUILAR,) Case No.: 2:17-CV-00003-AC
)
13 Plaintiff,) STIPULATION AND PROPOSED ORDER
) FOR A FIRST EXTENSION OF 30 DAYS
14 vs.) FOR DEFENDANT TO RESPOND TO
) PLAINTIFF’S MOTION FOR SUMMARY
16 NANCY A. BERRYHILL,) JUDGMENT AND FILE HER CROSS-
Acting Commissioner of Social Security,) MOTION FOR SUMMARY JUDGMENT
)
18 Defendant.)
)

19

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 four
 24 employment law matters in active litigation, three pending before the pending Equal
 25 Employment Opportunity Commission and another before the Merit Systems Protection Board.
 26 In addition, Defendant’s counsel has more than a dozen other pending district court and Ninth
 27 Circuit cases with filing deadlines imminent. The additional time requested is needed to
 28

1 adequately research the issues Plaintiff has presented. The current due date is September 11,
2 2017. The new due date will be October 11, 2017.

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

6
7 Respectfully submitted,

8 Dated: September 11, 2017

9 /s/ Steven Rosales
10 (as authorized by email on Sept. 11, 2017)
11 STEVEN ROSALES
12 Law Offices of Lawrence D. Rohlfing
13 Attorney for Plaintiff

14 Dated: September 11, 2017

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

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

24 **ORDER**

25 APPROVED AND SO ORDERED:

26 DATED: September 11, 2017

27 
28 ALLISON CLAIRE
29 UNITED STATES MAGISTRATE JUDGE