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8 Attorneys for Defendant

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

13 VERA RADOVA on behalf of ROMAN)
14 RADOVA)
15 Plaintiff,)
16 vs.)
17 NANCY A. BERRYHILL)
Acting Commissioner of Social Security,)
18 Defendant.)

Case No.: 2:17-cv-00187-CKD

**JOINT STIPULATION AND
[PROPOSED] ORDER FOR EXTENSION
OF TIME FOR DEFENDANT TO
RESPOND TO PLAINTIFF'S MOTION
FOR SUMMARY JUDGMENT**

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21 IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record,
22 that the time for responding to Plaintiff's Motion for Summary Judgment be extended from
23 September 27, 2017 to **October 27, 2017**. This is Defendant's first request for extension. Good
24 cause exists to grant Defendant's request for extension. Additional time is required as counsel
25 for Defendant has been suffering from ongoing debilitating chronic migraines, which impairs her
26 vision. Counsel for Defendant has over 50+ active pending matters, of which require 2+
27 dispositive motions until mid-October. As a result of Counsel's chronic migraines, she had to
28 take intermittent medical leave and became behind on her heavy caseload. As a result,

JS and PO for Extension of Time; 2:17-cv-00187-CKD

1 Defendant needs additional time to properly respond to Plaintiff's Motion for Summary
2 Judgment. Counsel for Defendant apologizes for the belated nature of this request, but did not
3 anticipate seeking an extension due to her ongoing medical condition. Defendant makes this
4 request in good faith with no intention to unduly delay the proceedings. The parties further
5 stipulate that the Court's Scheduling Order shall be modified accordingly.

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7 Respectfully submitted,

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9 Dated: September 22, 2017

s/ *Jesse Kaplan
(*as authorized by email on September 22, 2017)
JESSE KAPLAN
Attorney for Plaintiff

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13 Dated: September 22, 2017

PHILLIP A. TALBERT
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17 By /s/ Tina L. Naicker
18 TINA L. NAICKER
19 Special Assistant U.S. Attorney
Attorneys for Defendant

20 **ORDER**

21 APPROVED AND SO ORDERED:

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24 Dated: September 26, 2017

Carolyn K. Delaney
CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE