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8 Attorneys for Defendant

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

12
13 VERA RADOVA on behalf of ROMAN) Case No.: 2:17-cv-00187-CKD
14 RADOVA)
15 Plaintiff,) **JOINT STIPULATION AND**
16 vs.) **[PROPOSED] ORDER FOR EXTENSION**
17 NANCY A. BERRYHILL) **OF TIME FOR DEFENDANT TO**
Acting Commissioner of Social Security,) **RESPOND TO PLAINTIFF'S MOTION**
18) **FOR SUMMARY JUDGMENT**
19 Defendant.)

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 from
22 October 27, 2017 to **November 27, 2017**. This is Defendant's second request for extension.
23 Good cause exists to grant Defendant's request for extension. Additional time is required as
24 counsel for Defendant sprained her right thumb. As a result, Counsel has been on unexpected
25 medical leave. In addition, Counsel for Defendant has over 50+ active pending matters, of which
26 require 2+ dispositive motions until end of December. As a result of Counsel's medical leave,
27 she is behind on her heavy caseload. In addition, Counsel for Plaintiff recently filed a
28 supplemental document on October 22, 2017, which necessitates further review by Counsel and

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

1 the agency. Defendant needs additional time to assess Plaintiff's argumenta and properly
2 respond to Plaintiff's Motion for Summary Judgment or consider settlement options based on
3 Counsel's new authority provided on October 22, 2017. Counsel for Defendant apologizes for
4 the belated nature of this request, but did not anticipate seeking an extension due to her recent
5 hand sprain and medical leave. Defendant makes this request in good faith with no intention to
6 unduly delay the proceedings. The parties further stipulate that the Court's Scheduling Order
7 shall be modified accordingly.

8
9 Respectfully submitted,

10 Dated: October 23, 2017

s/ *Jesse Kaplan
(*as authorized by email on October 23, 2017)
JESSE KAPLAN
Attorney for Plaintiff

13 Dated: October 23, 2017

PHILLIP A. TALBERT
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DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

17 By /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant U.S. Attorney
Attorneys for Defendant

20 **ORDER**

21 APPROVED AND SO ORDERED:

24 Dated: October 24, 2017


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