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Attorneys for Defendant

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

VERA RADOVA on behalf of ROMAN
RADOVA
Plaintiff,
vs.
NANCY A. BERRYHILL
Acting Commissioner of Social Security,
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

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Summary Judgment be extended from November 27, 2017 to December 11, 2017. This is Defendant's third request for extension. Good cause exists to grant Defendant's request for extension. Additional time is required as counsel for Defendant was on intermittent sick leave from her chronic migraines, which impairs her vision. In addition, good cause also exists as Counsel for Defendant is expected to be on leave for the Thanksgiving holiday. Counsel for Defendant has over 70+ active pending matters, of which require 2+ dispositive motions until January 2018. As a result of Counsel's unanticipated medical leave, she became behind on her heavy caseload. As such, Defendant

1 needs additional time to assess Plaintiff's arguments and properly respond to Plaintiff's Motion
2 for Summary Judgment. Counsel for Defendant apologizes for the belated nature of this request,
3 but did not anticipate seeking an extension due to her chronic migraines. 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.

6
7 Respectfully submitted,

8 Dated: November 21, 2017

s/ *Jesse Kaplan
(*as authorized by email on November 21, 2017)
JESSE KAPLAN
Attorney for Plaintiff

9
10 Dated: November 21, 2017

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11
12 By /s/ Tina L. Naicker
13 TINA L. NAICKER
14 Special Assistant U.S. Attorney
15 Attorneys for Defendant

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19 **ORDER**

20 Plaintiff's complaint was filed on January 27, 2017. (ECF No. 1.) The answer and
21 administrative transcript were filed on May 24, 2017. (ECF Nos. 10, 11.) Subsequently,
22 plaintiff and the commissioner have each been granted two extensions of time to file their
23 respective motions. (ECF Nos. 14, 16, 19, 24.) The court grants this current stipulated
24 extension—the fifth in this matter. However, parties are advised that no additional extensions
25 will be granted, absent exceptional circumstances.

26 APPROVED AND SO ORDERED:

27 Dated: November 27, 2017

Carolyn K. Delaney
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CAROLYN K. DELANEY
JS and PO for Extension of Time; 2:17-cv-00187-CKD UNITED STATES MAGISTRATE JUDGE