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8 Attorneys for Defendant

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

13	TRACY HIMES,)	Case No.: 2:17-cv-00403-AC
14)	
15	Plaintiff,)	JOINT STUPULATION AND
16	vs.)	[PROPOSED] ORDER FOR EXTENSION
17)	OF TIME
18	NANCY A. BERRYHILL)	
19	Acting Commissioner of Social Security,)	
	Defendant.)	

20
 21 Defendant Nancy A. Berryhill, Acting Commissioner of Social Security (“Defendant”)
 22 respectfully requests that the Court extend the time for Defendant to file her Opposition to
 23 Plaintiff’s Motion for Summary Judgment, originally due on August 7, 2017, by 30 days,
 24 through and including Wednesday, September 6, 2017. This is the Commissioner’s first request
 25 for an extension of time in this matter.

26 An extension of time is needed in order to prepare Defendant’s opposition because
 27 counsel has three oppositions to motions for summary judgment due this next week, and is
 28 further responsible for a major discovery production due next week. This request is made in

Stipulation for Extension of Time; 2:17-cv-00403-AC

1 good faith with no intention to unduly delay the proceedings. Counsel's office conferred with
2 Plaintiff's counsel, who had no objection to this request, on August 3, 2017.

3
4 Respectfully submitted,

5 Dated: August 4, 2017

6 PHILIP A. TALBERT
7 United States Attorney
8 DEBORAH LEE STACHEL
9 Regional Chief Counsel, Region IX
10 Social Security Administration

11 By: /s/ Adam Lazar
12 ADAM LAZAR
13 Special Assistant U.S. Attorney
14 Attorneys for Defendant

15 Dated: August 4, 2017

16 By: /s/ Richard Whitaker*
17 RICHARD A. WHITAKER
18 (*by email authorization)
19 Attorney for Plaintiff

20
21 **ORDER**

22 IT IS SO ORDERED.

23 Date: August 7, 2017

24 
25 _____
26 ALLISON CLAIRE
27 UNITED STATES MAGISTRATE JUDGE
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