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9 Attorneys for Defendant

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

12 JON DELAROSA,) Case No.: 2:17-CV-00423-AC
)
13 Plaintiff,) STIPULATION AND PROPOSED ORDER
) FOR A FIRST EXTENSION OF 21 DAYS
14 vs.) FOR DEFENDANT TO RESPOND TO
) PLAINTIFF’S MOTION FOR SUMMARY
16 NANCY A. BERRYHILL,) JUDGMENT AND FILE HER CROSS-
Deputy Commissioner for Operations,) MOTION FOR SUMMARY JUDGMENT
17 performing the duties and functions not)
18 reserved to the Commissioner of Social)
Security,)
19	
20 Defendant.	

21 IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record,
 22 that Defendant shall have a first extension of time of 21 days to respond to Plaintiff’s Motion for
 23 Summary Judgment and file her Cross-Motion for Summary Judgment. This extension is
 24 requested because Defendant’s counsel is experiencing an exceptionally heavy workload at this
 25 time. In addition to several district court filing deadlines this month, Defendant’s counsel was
 26 recently assigned to represent the Social Security Administration in a three-day employment law
 27 hearing before the Equal Employment Opportunity Commission. The additional time requested
 28

1 will enable Defendant to adequately research the issues presented in this case. The current due
2 date is April 12, 2018. The new due date will be May 3, 2018.

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

6
7 Respectfully submitted,

8 Dated: April 9, 2018

/s/ Robert Weems*

(*as authorized by email)

9 ROBERT WEEMS

10 Attorney for Plaintiff

11
12 Dated: April 9, 2018

MCGREGOR W. SCOTT

13 United States Attorney

DEBORAH LEE STACHEL

14 Regional Chief Counsel, Region IX,

15 Social Security Administration

16 By: /s/ Jennifer A. Kenney

JENNIFER A. KENNEY

17 Special Assistant U.S. Attorney

18 Attorneys for Defendant

19 **ORDER**

20 APPROVED AND SO ORDERED:

21
22 DATED: April 11, 2018

Allison Claire

23 ALLISON CLAIRE

24 UNITED STATES MAGISTRATE JUDGE