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8 Attorneys for Defendant

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

13 WANDA EDMON,
 14 Plaintiff,
 15 vs.
 16 NANCY A. BERRYHILL,
 Acting Commissioner of Social Security,
 17 Defendant.
 18

) Case No.: 2:17-cv-00447-EFB

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

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 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 for thirty
 22 days from November 17, 2017 to **December 17, 2017**. This is Defendant's first request for
 23 extension. Good cause exists to grant Defendant's request for extension. Counsel for Defendant
 24 (Counsel) was on intermittent medical leave due to a recent hand injury and for chronic
 25 migraines. As a result of Counsel's unanticipated medical leave, Counsel became behind on her
 26 caseload. Counsel currently has an active caseload of over 70 pending active social security
 27 matters that require two or more dispositive motions a week until mid-December. In addition,
 28 Counsel has a Ninth Circuit brief due on or around December 12, 2017. Due to shortened staff

1 and high workload demands, Defendant respectfully requests additional time in order to
2 adequately assess the issues raised in Plaintiff's Motion. Counsel apologizes for the belated
3 nature of the request, but did not anticipate taking additional medical leave. Defendant makes
4 this 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: November 14, 2017

/s/ *Bess M. Brewer
(*as authorized by email on November 8, 2017)
BESS M. BREWER
Attorney for Plaintiff

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13 Dated: November 14, 2017

PHILLIP A. TALBERT
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DEBORAH LEE STACHEL
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Social Security Administration

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

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21 **ORDER**

22 APPROVED AND SO ORDERED.

23 DATED: November 20, 2017.

24 
EDMUND F. BRENNAN
UNITED STATES MAGISTRATE JUDGE