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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 five
 22 days from December 17, 2017 to **December 22, 2017**. This is Defendant's second request for
 23 extension. Good cause exists to grant Defendant's request for extension. Counsel for Defendant
 24 (Counsel) was out on sick leave with the cold/flu. As a result of Counsel's unanticipated
 25 medical leave, Counsel became behind on her caseload. Counsel currently has an active
 26 caseload of over 70 pending active social security matters that require two or more dispositive
 27 motions a week until mid-January. Due to shortened staff and high workload demands,
 28 Defendant respectfully requests additional time in order to adequately assess the issues raised in

1 Plaintiff's Motion. Counsel apologizes for the belated nature of the request, but did not
2 anticipate taking additional medical leave. Defendant makes this request in good faith with no
3 intention to unduly delay the proceedings. The parties further stipulate that the Court's
4 Scheduling Order shall be modified accordingly.

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6 Respectfully submitted,

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8 Dated: December 13, 2017

/s/ *Bess M. Brewer
(*as authorized by email on December 13, 2017)
BESS M. BREWER
Attorney for Plaintiff

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10
11 Dated: December 13, 2017

PHILLIP A. TALBERT
United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
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16 By /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant U.S. Attorney
Attorneys for Defendant

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20 **ORDER**

21 APPROVED AND SO ORDERED.

22 DATED: December 18, 2017.


EDMUND F. BRENNAN
UNITED STATES MAGISTRATE JUDGE