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8 Attorneys for Defendant

9 **UNITED STATES DISTRICT COURT**
 10 **EASTERN DISTRICT OF CALIFORNIA**

12 SARAH BARNES,)	Case No.: 2:17-cv-00458-CMK
)	
13 Plaintiff,)	JOINT STUPULATION AND ORDER
)	FOR EXTENSION OF TIME
14 vs.)	
)	
16 NANCY A. BERRYHILL)	
17 Acting Commissioner of Social Security,)	
)	
18 Defendant.)	

19
 20 Defendant Nancy A. Berryhill, Acting Commissioner of Social Security (“Defendant”)
 21 respectfully requests that the Court extend the time for Defendant to file her Opposition to
 22 Plaintiff’s Motion for Summary Judgment, originally due on October 2, 2017, by 45 days,
 23 through and including Thursday, November 16, 2017. This is the Commissioner’s first request
 24 for an extension of time in this matter.

25 An extension of time is needed in order to prepare Defendant’s opposition because
 26 counsel will be on his honeymoon for the last three weeks of September and the beginning of
 27 October, and faces a heavy caseload when he returns. This request is made in good faith with no
 28 intention to unduly delay the proceedings. Counsel’s office conferred with Plaintiff’s counsel,
 who had no objection to this request, on September 8, 2017.

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Respectfully submitted,

Dated: September 8, 2017

PHILIP A. TALBERT
United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

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

Dated: September 8, 2017

By: /s/ Young Cho*
YOUNG CHO
(*by email authorization)
Attorney for Plaintiff

ORDER

IT IS SO ORDERED.

Dated: September 11, 2017


CRAIG M. KELLISON
UNITED STATES MAGISTRATE JUDGE