

1 PHILIP A. TALBERT
United States Attorney
2 DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
3 Social Security Administration
ADAM LAZAR, CSBN 237485
4 Special Assistant United States Attorney
5 160 Spear Street, Suite 800
San Francisco, California 94105
6 Telephone: (415) 268-5601
7 Facsimile: (415) 744-0134
E-Mail: adam.lazar@ssa.gov

8 Attorneys for Defendant

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

11
12 ROY EASLEY,) Case No.: 2:17-cv-00475-CKD
13)
Plaintiff,)
14) **JOINT STIPULATION AND**
vs.) **~~PROPOSED~~ ORDER FOR EXTENSION**
15) **OF TIME**
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 24, 2017, by 30 days,
23 through and including Thursday, November 23, 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 of
26 counsel’s heavy workload during October. This request is made in good faith with no intention
27 to unduly delay the proceedings. Counsel’s office conferred with Plaintiff’s counsel, who had no
28 objection to this request, on October 23, 2017.

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Respectfully submitted,

Dated: October 23, 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: October 23, 2017

By: /s/ Joseph C. Fraulob*
JOSEPH C. FRAULOB
(*by email authorization)
Attorney for Plaintiff

ORDER

IT IS SO ORDERED.

Dated: October 25, 2017



CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE