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3	Social Security Administration		
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9	UNITED STATES DISTRICT COURT		
10	EASTERN DISTRICT OF CALIFORNIA		
11	SACRAMENTO DIVISION		
12			
13	GERALD WILLIAM HUDSON,) Case No.: 2:17-cv-00589-CMK	
14	Plaintiff,)) STIPULATION AND ORDER FOR AN	
15	VS.) EXTENSION OF TIME OF 45 DAYS FOR) DEFENDANT'S RESPONSE TO	
	NANCY A. BERRYHILL,) PLAINTIFF'S MOTION FOR SUMMARY	
16	Acting Commissioner of Social Security,) JUDGMENT	
17)	
	Defendant.	ý)	
18)	
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20	IT IS HEREBY STIPLII ATED by and	between the parties, through their respective	
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counsel of record, that Defendant shall have an extension of time of an additional 45 days to respond to Plaintiff's motion for summary judgment. This is the first continuance sought by Defendant. The current due date is October 11, 2017. The new due date will be November 27, 2017.

There is good cause for this request. Since the filing of Plaintiff's motion for summary judgment, Defendant's counsel has been diligently addressing her full workload including several district court cases and one Equal Employment Opportunity Commission matter involving discovery, depositions, and travel. Moreover, in October, Defendant's counsel was assigned additional unanticipated matters that involved hearing and witness preparation. Despite
counsel's diligence in responding to the new matters and her remaining workload, counsel was
set back in addressing a number of her cases, including this one, and other cases that have been
extended. Furthermore, Defendant's counsel will be traveling for work, attending two hearings,
and conducting additional depositions in the remainder of October and November. She will also
be addressing other district court cases that have already been extended, previous to this one, due
to her schedule.

Therefore, Defendant is respectfully requesting additional time up to and including November 27, 2017, to fully review the record and research the issues presented by Plaintiff's motion for summary judgment in this case. This request is made in good faith with no intention to unduly delay the proceedings.

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

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14 Respectfully submitted, 15 Date: October 11, 2017 LAW OFFICES OF STUART T. BARASCH 16 s/ Oscar Gomez for Stuart T. Barasch by C.Chen* 17 (As authorized by phone on 10/11/2017) STUART T. BARASCH 18 Attorneys for Plaintiff 19 PHILLIP A. TALBERT Date: October 11, 2017 20 United States Attorney 21 By <u>s/ Carolyn B. Chen</u> 22 CAROLYN B. CHEN Special Assistant U. S. Attorney 23 Attorneys for Defendant 24 25 /// 26 /// 27 28 111

1		ORDER
1	APPROVED AND SO ORDERED:	
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3 4	Dated: October 12, 2017	Lonin M Kellison
5		CRAIG M KELLISON
6		UNITED STATES MAGISTRATE JUDGE
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