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8 Attorneys For Defendant

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

12 JOSHUA SPAGEL,	)	Case No. 2:17-CV-00839-AC
	)	
13 Plaintiff,	)	
	)	
14 v.	)	STIPULATION FOR AN EXTENSION
15 NANCY A. BERRYHILL, Acting	)	OF TIME AND <del>PROPOSED</del> ORDER
Commissioner of Social Security,	)	(FIRST REQUEST)
	)	
16 Defendant.	)	
	)	
	)	
	)	

18  
 19 Defendant Nancy A. Berryhill, Acting Commissioner of Social Security (“Defendant”)  
 20 respectfully requests that the Court extend the time for Defendant to file her Answer to the Complaint,  
 21 due on August 9, 2017, by 30 days, through and including September 8, 2017.

22 An extension of time is needed in order to prepare Defendant’s Answer because the  
 23 Commissioner is still in the process of assembling and finalizing the administrative record. This request  
 24 is made in good faith with no intention to unduly delay the proceedings.

1 Counsel for Defendant conferred with Plaintiff's counsel's by email, who has no opposition to  
2 this request on August 7, 2017.

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

4 Counsel for Defendant apologizes to the Court and opposing counsel for any inconvenience  
5 caused by this delay.

6 Respectfully submitted,

7  
8 Date: August 7, 2017

9 /s/ Cyrus Safa  
10 CYRUS SAFA,  
11 Attorney for Plaintiff  
12 As authorized by email  
13 On 8/7/17

14 PHILLIP A. TALBERT  
15 United States Attorney

16 By: /s/ Richard M. Rodriguez  
17 RICHARD M. RODRIGUEZ  
18 Special Assistant United States Attorney

19 Attorneys for Defendant

20 **ORDER**

21 **APPROVED AND SO ORDERED:**

22  
23 Dated: August 7, 2017

24 Allison Claire  
25 ALLISON CLAIRE  
26 UNITED STATES MAGISTRATE JUDGE