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8 Attorneys for Defendant

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

12	MARISELA RAMOS,)	Case No.: 2:17-cv-01007-CMK
13)	
14	Plaintiff,)	JOINT STUPULATION AND ORDER
15	vs.)	FOR EXTENSION 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 December 20, 2017, by 14 days,
 23 through and including January 3, 2018. This is the Commissioner’s second request for an
 24 extension of time in this matter.

25 Good cause exists to grant a brief extension in this matter for Defendant to file her
 26 opposition because of counsel’s workload in the weeks prior to the holidays, including a major
 27 EEOC discovery production, four district court summary judgment motions due last week, and a
 28 major EEOC summary adjudication motion due next week, in addition to the brief in the present
 matter. This request is made in good faith with no intention to unduly delay the proceedings.

1 Counsel's office conferred with Plaintiff's counsel, who had no objection to this request, on
2 December 14, 2017.

3
4 Respectfully submitted,

5 Dated: December 19, 2017

6 PHILIP A. TALBERT
7 United States Attorney
8 DEBORAH LEE STACHEL
9 Regional Chief Counsel, Region IX
10 Social Security Administration

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

15 Dated: December 19, 2017

16 By: /s/ Lawrence Rohlfing*
17 LAWRENCE ROHLFING
18 (*by email authorization)

19 Attorney for Plaintiff

20 **ORDER**

21 IT IS SO ORDERED.

22 Dated: December 21, 2017

23 
24 **CRAIG M. KELLISON**
25 UNITED STATES MAGISTRATE JUDGE
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