

1 December, Defendant's counsel participated in a hearing for another employment case involving
2 travel and that was unexpectedly continued twice, into the week of December 18, 2017, the same
3 week as the original deadline for Defendant's response due Friday, December 22.

4 Moreover, Defendant is requesting an additional 30 days because of pre-approved leave
5 in the months of December and early January, and additional unanticipated workload reasons,
6 such as briefing for the employment hearing matter that was continued twice in December,
7 described above.

8 Therefore, Defendant is respectfully requesting additional time up to and including
9 January 22, 2018, to fully review the record and research the issues presented by Plaintiff's
10 motion for summary judgment in this case. This request is made in good faith with no intention
11 to unduly delay the proceedings.

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

14
15 Respectfully submitted,

16 Date: December 21, 2017

BARBARA M. RIZZO, ATTORNEY AT LAW

17
18 s/ Barbara M. Rizzo by C. Chen*
19 (As authorized by email on 12/20/2017)
20 BARBARA M. RIZZO
Attorneys for Plaintiff

21 Date: December 21, 2017

PHILLIP A. TALBERT
United States Attorney

22
23 By s/ Carolyn B. Chen
24 CAROLYN B. CHEN
Special Assistant U. S. Attorney
Attorneys for Defendant

25 ORDER

26 APPROVED AND SO ORDERED.

27
28 DATED: January 3, 2018.


EDMUND F. BRENNAN
UNITED STATES MAGISTRATE JUDGE