

1 MCGREGOR W. SCOTT
United States Attorney
2 DEBORAH STACHEL
Regional Chief Counsel, Region IX
3 Social Security Administration
Chantal R. Jenkins, SBN PA 307531
4 Special Assistant United States Attorney
160 Spear Street, Suite 800
5 San Francisco, California 94105
6 Telephone: (415) 977-8931
7 Facsimile: (415) 744-0134
E-Mail: Chantal.Jenkins@ssa.gov

8 Attorneys for Defendant

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

13 CHARLES HENRY BELL,

14 Plaintiff,

15 vs.

17 NANCY A. BERRYHILL,
Acting Commissioner of Social Security,

18 Defendant.
19

) Case No.: 2:17-cv-01195-KJN

)
) STIPULATION & ORDER FOR
) EXTENSION FOR DEFENDANT TO
) RESPOND TO PLAINTIFF'S MOTION FOR
) SUMMARY JUDGMENT

20
21 IT IS HEREBY STIPULATED, by and between the parties, through their respective
22 counsel of record, that Defendant shall have an extension of time of 30 days to respond to
23 Plaintiff's motion for summary judgment. The current due date is January 22, 2018. The new
24 due date will be February 21, 2018.

25 Defendant respectfully requests this additional time because Defendant's counsel is
26 managing a heavy caseload. Since Plaintiff's counsel filed her motion for summary judgment,
27 Defendant's counsel has been engaged in discovery in two cases before the Equal Employment
28

1 Opportunity Commission (EEOC). In addition, counsel has several district court briefs for social
2 security disability cases and an oral argument this month.

3 Defendant's counsel contacted Plaintiff's counsel via telephone on January 19th and
4 Plaintiff's counsel has agreed to the extension request.

5 This request is made in good faith with no intention to unduly delay the proceedings.

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

8 Counsel apologizes to the Court for any inconvenience caused by this delay.

9
10 Respectfully submitted,

11 Dated: January 18, 2018

/s/ Steven Berniker by Chantal R. Jenkins*

12 *As authorized via email on January 19,
13 2018

14 Steven Berniker
15 Attorney for Plaintiff

16 Respectfully submitted,

17 MCGREGOR W. SCOTT
18 United States Attorney

19 Dated: January 18, 2018

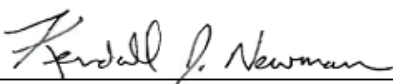
/s/ Chantal R. Jenkins

20 Chantal R. Jenkins
21 Special Assistant United States Attorney

22
23 ORDER

24 PURSUANT TO STIPULATION, IT IS SO ORDERED.

25 Dated: January 24, 2018

26 
27 _____
28 KENDALL J. NEWMAN
UNITED STATES MAGISTRATE JUDGE