| 1 2 3 4 5 6 7 8 | MCGREGOR W. SCOTT United States Attorney DEBORAH LEE STACHEL Regional Chief Counsel DANIEL P. TALBERT Special Assistant United States Attorney Social Security Administration 160 Spear Street, Suite 800 San Francisco, CA 94105 Telephone: (415) 977-8995 Facsimile: (415) 744-0134 Attorneys for Defendant | | |
|--------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------|--|
| 10 | UNITED STATES DISTRICT COURT | | |
| 11 | EASTERN DISTRICT OF CALIFORNIA | | |
| 12 | SACRAMENTO DIVISION | | |
| 13 | | | |
| 14 | JANICE MARIE GOODMAN, | No. 2:17-cv-01228-CKD | |
| 15 | Plaintiff, | STIPULATION AND ORDER TO EXTEND | |
| 16 | v. | TIME TO FILE DEFENDANT'S CROSS- | |
| 17 | NANCY A. BERRYHILL, Acting Commissioner of Social Security, | MOTION FOR SUMMARY JUDGMENT | |
| 18 | Defendant. | | |
| 19 | | | |
| 20 | The parties stipulate, with the approval of this Court, to modification of the Court's | | |
| 2122 | scheduling order, as follows: | | |
| 23 | (i) Defendant shall have 30 days from the date of this order to supplement the | | |
| 24 | administrative record; | •• | |
| 25 | (ii) Plaintiff shall have 14 days fr | om the date Defendant files her supplement to the | |
| 26 | administrative record to file an amended motion for summary judgment, if any; | | |
| 27 | (iii) Defendant shall have 30 days from the date Plaintiff files her amended motion for | | |
| 28 | summary judgment to file her | cross-motion for summary judgment; | |
| | | | |

| 1 | (iv) Plaintiff shall have 21 days from the date Defendant files her cross-motion for | | |
|----|----------------------------------------------------------------------------------------------------|---------------------------------------------------|--|
| 2 | summary judgment to file a response. | | |
| 3 | This is the Commissioner's first request for an extension. There is good cause for this extension | | |
| 4 | because counsel for the Commissioner has determined that the certified administrative record | | |
| 5 | lodged in this case is missing several pages submitted to the Appeals Council that should be | | |
| 6 | included in the record, and counsel must obtain those missing pages to file with this Court before | | |
| 7 | briefing can be completed. Plaintiff's counsel has stated that he does not oppose this first | | |
| 8 | extension request. | | |
| 9 | Res | spectfully submitted, | |
| 10 | II | <u>Robert Weems</u> BERT WEEMS | |
| 11 | | orney for Plaintiff | |
| 12 | | chorized via email | |
| 13 | MC | GREGOR W. SCOTT | |
| 14 | Un | ted States Attorney | |
| 15 | | <u>Daniel P. Talbert</u> NIEL P. TALBERT | |
| 16 | | ecial Assistant United States Attorney | |
| 17 | Att | orneys for Defendant | |
| 18 | | | |
| 19 | PURSUANT TO STIPULATION, IT IS SO ORDERED. | | |
| 20 | | 00101 | |
| 21 | Dated: April 26, 2018 | Carop U. Delany | |
| 22 | | CAROLYN K. DELANEY UNITED STATES MAGISTRATE JUDGE | |
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