

1 PHILLIP A. TALBERT  
 United States Attorney  
 2 DEBORAH LEE STACHEL  
 Regional Chief Counsel, Region IX  
 3 Social Security Administration  
 4 MARGARET BRANICK-ABILLA, CSBN 223600  
 Special Assistant United States Attorney  
 5 160 Spear Street, Suite 800  
 San Francisco, California 94105  
 6 Telephone: (415) 977-8929  
 7 Facsimile: (415) 744-0134  
 E-Mail: Margaret.Branick-Abilla@ssa.gov

8 Attorneys for Defendant

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

13 ALEXANDRIA BAUGH,	)	Case No.: 2:17-cv-01382-AC
	)	
14 Plaintiff,	)	STIPULATION & <del>PROPOSED</del> ORDER
	)	FOR EXTENSION OF TIME
15 vs.	)	
	)	
16 NANCY A. BERRYHILL,	)	
17 Acting Commissioner of Social Security,	)	
	)	
18 Defendant.	)	

19 \_\_\_\_\_  
 20  
 21 IT IS HEREBY STIPULATED, by and between the parties through their respective  
 22 counsel of record, that Defendant shall have a 35-day extension of time, from December 8, 2017,  
 23 to January 12, 2018, for Defendant to respond to Plaintiff’s Motion for Summary Judgment. All  
 24 other dates in the Court’s Scheduling Order shall be extended accordingly.

25 This is Defendant’s first request for an extension of time. Defendant respectfully submits  
 26 that good cause exists for the requested extension because Defendant’s counsel requires  
 27 additional time to review the record, to evaluate the issues raised in Plaintiff’s Motion for  
 28 Summary Judgment, to determine whether options exist for settlement, to prepare Defendant’s

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1 response to Plaintiff's Motion if settlement is not possible, and to accommodate competing  
2 workloads. This request is made in good faith with no intention to unduly delay the proceedings.  
3 Plaintiff does not oppose the requested extension.

4  
5 Respectfully submitted,

6 Dated: December 1, 2017

LAW OFFICE OF NANCY MCCOMBS

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8 By: /s/ Nancy K. McCombs\*  
9 NANCY K. MCCOMBS  
10 Attorneys for Plaintiff  
11 [\*As authorized by e-mail on Dec. 1, 2017]

12 Dated: December 4, 2017


PHILLIP A. TALBERT  
United States Attorney  
DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX  
Social Security Administration

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15  
16 By: /s/ Margaret Branick-Abilla  
17 MARGARET BRANICK-ABILLA  
18 Special Assistant United States Attorney  
19 Attorneys for Defendant

20 **[PROPOSED] ORDER**

21 Pursuant to stipulation, IT IS SO ORDERED.

22  
23  
24 Dated: December 4, 2017

25   
26 ALLISON CLAIRE  
27 UNITED STATES MAGISTRATE JUDGE  
28

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