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

12
13 ALEXIS DENISE BLACKWELL,) Case No.: 2:17-cv-01599-CKD
14 Plaintiff,)
15 vs.) STIPULATION AND ~~PROPOSED~~ ORDER
16 NANCY A. BERRYHILL,) FOR AN EXTENSION OF TIME OF 35
Acting Commissioner of Social Security,) DAYS FOR DEFENDANT’S RESPONSE TO
17 Defendant.) PLAINTIFF’S MOTION FOR SUMMARY
18) JUDGMENT

19
20 IT IS HEREBY STIPULATED, by and between the parties, through their respective
21 counsel of record, that Defendant shall have an extension of time of 35 additional days to
22 respond to Plaintiff’s motion for summary judgment. The current due date is March 20, 2018.
23 The new due date will be April 24, 2018.

24 There is good cause for this request. Since the filing of Plaintiff’s motion for summary
25 judgment, Defendant’s counsel has been diligently addressing her full workload including
26 several district court cases and one Equal Employment Opportunity Commission matter
27 involving briefing. Moreover, recently, Defendant’s counsel was assigned unanticipated work,
28 including an additional employment law matter involving the appeal of a recently received

1 decision, with the appeal due around the same time as the original due date of Defendant's
2 response in this case, that could not be assigned to another attorney and that could not be
3 extended. Defendant's counsel continues to have a full workload of district court cases and
4 employment law cases in the next month.

5 Thus, Defendant is respectfully requesting additional time up to and including April 24,
6 2018, to fully review the record and research the issues presented by Plaintiff's motion for
7 summary judgment in this case. This request is made in good faith with no intention to unduly
8 delay the proceedings.

9 Respectfully submitted,

10 Date: March 20, 2018

MONICA PERALES, LAW OFFICES OF
LAWRENCE D. ROHLFING

11
12 *s/ Monica Perales by C.Chen**
13 (As authorized by email on 3/20/2018)
14 MONICA PERALES
Attorneys for Plaintiff

15 Date: March 20, 2018

MCGREGOR W. SCOTT
United States Attorney

17 By *s/ Carolyn B. Chen*
18 CAROLYN B. CHEN
Special Assistant U. S. Attorney

19 Attorneys for Defendant

20
21
22 ORDER

23 APPROVED AND SO ORDERED:

24 Dated: March 22, 2018

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26 _____
CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE