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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 ORDER FOR AN
16 NANCY A. BERRYHILL,) EXTENSION OF TIME OF 7 DAYS FOR
Acting Commissioner of Social Security,) 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 7 additional days to respond
22 to Plaintiff’s motion for summary judgment. The current due date is April 24, 2018. The new
23 due date will be May 1, 2018.

24 There is good cause for this request. Since the court’s granting of Defendant’s previous
25 request for an extension of time to file Defendant’s response to Plaintiff’s motion for summary
26 judgment, Defendant’s counsel has been diligently addressing her full workload and was
27 assigned additional and unanticipated matters that had immediate deadlines and could not be
28 assigned to another attorney, including filing an appeal to a recently received decision from the

1 California Unemployment Insurance Appeals Board. Furthermore, the weekend of March 30,
2 2018, Defendant's counsel had a serious personal emergency and took multiple days of leave to
3 address and recover from the emergency. Defendant's counsel is addressing the backlog of cases
4 that she could not address while on leave.

5 Thus, Defendant is respectfully requesting additional time up to and including May 1,
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: April 23, 2018

MONICA PERALES, LAW OFFICES OF
LAWRENCE D. ROHLFING

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12 *s/ Monica Perales by C.Chen**
13 (As authorized by email on 4/23/2018)
14 MONICA PERALES
Attorneys for Plaintiff

15 Date: April 23, 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 The parties are advised that, absent extraordinary cause, no further extensions of time will be
25 granted.

26 Dated: April 24, 2018

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CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE