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

13 ALVIN SARTIAGUDA,)	Case No.: 2:17-cv-02280-CMK
14 Plaintiff,)	
15 vs.)	STIPULATION AND ORDER FOR AN
16 NANCY A. BERRYHILL,)	EXTENSION OF TIME OF 45 DAYS FOR
Acting Commissioner of Social Security,)	DEFENDANT'S RESPONSE TO
17 Defendant.)	PLAINTIFF'S MOTION FOR SUMMARY
)	JUDGMENT
18)	

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 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 45 additional days to
 22 respond to Plaintiff's motion for summary judgment. The current due date is June 4, 2018. The
 23 new due date will be July 19, 2018.

24 This is Defendant's first request for an extension of time in this case. There is good
 25 cause for this request. During the weekend of April 1, 2018, Defendant's counsel had a serious
 26 personal emergency and took multiple days of leave to address and recover from the emergency
 27 and continues to take leave intermittently for treatment. Defendant's counsel is continuing to
 28

1 address and prioritize the backlog of cases that she could not address while on leave, while also
2 balancing her full workload of district court cases and employment law matters.

3 Thus, Defendant is respectfully requesting additional time up to and including July 19,
4 2018, to fully review the record and research the issues presented by Plaintiff's motion for
5 summary judgment in this case. This request is made in good faith with no intention to unduly
6 delay the proceedings.

7 Respectfully submitted,

8 Date: June 1, 2018

LAW OFFICES OF LAWRENCE D. ROHLFING

9 *s/ Lawrence D. Rohlfing by C.Chen**
10 (As authorized by email on 5/31/2018)
11 LAWRENCE D. ROHLFING
12 Attorneys for Plaintiff

13 Date: June 1, 2018

MCGREGOR W. SCOTT
United States Attorney

14 By *s/ Carolyn B. Chen*
15 CAROLYN B. CHEN
16 Special Assistant U. S. Attorney

17 Attorneys for Defendant

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19 ORDER

20 APPROVED AND SO ORDERED:

21
22 Dated: June 4, 2018

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24 **CRAIG M. KELLISON**
25 UNITED STATES MAGISTRATE JUDGE
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