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

12
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
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 45 additional days to
22 respond to Plaintiff’s motion for summary judgment. The current due date was July 19, 2018.
23 The new due date will be September 4, 2018 (since September 2, 2018 falls on the weekend,
24 followed by the federal holiday on September 3, 2018).

25 This is Defendant’s second request for an extension of time in this case. There is good
26 cause for this request. Since the Court’s granting of the Defendant’s request for an extension of
27 time, Defendant’s counsel has been addressing a full workload of district court matters and other
28 matters that could not be assigned to another attorney. In addition, the parties have begun

1 discussion of a possible voluntary remand settlement, and Defendant is requesting additional
2 time to review the case. Lastly, additional time is necessary given that Defendant's counsel will
3 be on pre-approved leave for multiple weeks including in August.

4 Thus, Defendant is respectfully requesting additional time up to and including September
5 4, 2018, to respond to Plaintiff's motion for summary judgment in this case, should the case not
6 go forward with a voluntary remand. Defendant apologizes for the tardy request. This request is
7 made in good faith with no intention to unduly delay the proceedings.

8
9 Respectfully submitted,

10 Date: July 20, 2018

LAW OFFICES OF LAWRENCE D. ROHLFING

11 s/ Lawrence D. Rohlfing by C.Chen*
12 (As authorized by email on 7/20/2018)
13 LAWRENCE D. ROHLFING
14 Attorneys for Plaintiff

15 Date: July 20, 2018

MCGREGOR W. SCOTT
United States Attorney

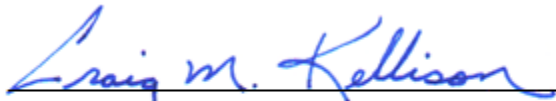
16 By s/ Carolyn B. Chen
17 CAROLYN B. CHEN
18 Special Assistant U. S. Attorney

19 Attorneys for Defendant

20
21 ORDER

22 APPROVED AND SO ORDERED:

23
24 Dated: July 24, 2018

25 
26 **CRAIG M. KELLISON**
27 UNITED STATES MAGISTRATE JUDGE
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