

1 MELINDA L. HAAG, CSBN 132612
 2 United States Attorney
 3 DEBORAH L. STACHEL, CSBN 230138
 4 Acting Regional Chief Counsel, Region IX
 5 Social Security Administration
 6 CAROLYN B. CHEN, CSBN 256628
 7 Special Assistant United States Attorney

8 160 Spear Street, Suite 800
 9 San Francisco, California 94105
 Telephone: (415) 977-8956
 Facsimile: (415) 744-0134
 E-Mail: Carolyn.Chen@ssa.gov

10 Attorneys for Defendant

11 UNITED STATES DISTRICT COURT
 12 NORTHERN DISTRICT OF CALIFORNIA

12 PHILLIP MAYS,)	CIVIL ACTION NO. 3:15-CV-02731-MEJ
13 Plaintiff,)	
14 v.)	STIPULATION AND PROPOSED ORDER
15 CAROLYN W. COLVIN, Acting)	FOR A FIRST EXTENSION FOR DEFENDANT
16 Commissioner of Social Security,)	TO FILE CROSS-MOTION FOR SUMMARY
17 Defendant.)	JUDGMENT
)	

18 IT IS HEREBY STIPULATED, by and between the parties, through their respective
 19 counsel of record, that Defendant shall have a first extension of time of 65 days to file her cross-
 20 motion for summary judgment and opposition to Plaintiff’s motion. The current due date is
 21 December 14, 2015. The new due date will be February 17, 2016.

22 This is the first continuance sought by Defendant. There is good cause for this request.
 23 Defendant is seeking this extension due to Defendant’s counsel’s heavy workload in the last
 24 month and continuing heavy workload in the next two months, including her regular district court
 25 caseload, a hearing for an Equal Employment Opportunity Commission (EEOC) case on
 26 December 4, 2015 with follow-up briefing; two other pending EEOC matters that require
 27 discovery, including depositions in the next few weeks, and briefing; two Ninth Circuit briefs due
 28 in December 2015 and January 2016; and a Ninth Circuit appellate oral argument in early

