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8 Attorneys for Defendant

9 **UNITED STATES DISTRICT COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**

11
12 CAROLYN WALKER,

13 Plaintiff

14 v.

15 CAROLYN W. COLVIN, Acting Commissioner
of Social Security,

16 Defendant.
17

) Civil No. 3:15-cv-05369 WHO

) **EX PARTE MOTION TO EXTEND**
) **TIME FOR DEFENDANT TO FILE**
) **HER COUNTER-MOTION FOR**
) **SUMMARY JUDGMENT**

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19 Defendant Carolyn W. Colvin, Acting Commissioner of Social Security, requests to extend the
20 time by two weeks, from April 25, 2016 to May 9, 2016 for the Commissioner to provide her Counter-
21 Motion For Summary Judgment, with all other dates in this Court's Procedural Order For Social
22 Security Review Actions extended accordingly. This is the Commissioner's first request for an
23 extension. The request is being made ex parte because counsel for the Defendant was unable to reach
24 Plaintiff's counsel via telephone or email in the hope of filing a stipulated motion.
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1 Counsel makes this request in good faith. There is good cause for this request because the case
2 was recently reassigned to new counsel for Defendant, who needs additional time to become familiar
3 with the facts and the issues presented in the opening brief, as well as a quality review of the brief in
4 accordance with our office procedures. There is also good cause for this extension because the
5 undersigned counsel is currently responsible for dozens of district court cases at various stages of
6 litigation, a Ninth Circuit Privacy Act case which is going to hearing on May 4, 2016, dozens of
7 subpoena and disclosure matters, two representative sanction matters, as well as a Federal Tort Claim
8 Act and other miscellaneous litigation cases in district court with current filing deadlines. As a result,
9 the Commissioner needs additional time to properly address the issues raised in Plaintiff's Motion For
10 Summary Judgment.
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13 Respectfully submitted,

14 Date: April 22, 2016

BRIAN STRETCH
United States Attorney

16 By: /s/ Patrick William Snyder
17 PATRICK WILLIAM SNYDER
18 Special Assistant United States Attorney


19 Of Counsel, JAMES BIELENBERG

Attorneys for Defendant

20 **ORDER**

21 IT IS ORDERED that the Commissioner shall have until May 9, 2016 to file her Counter-
22 Motion For Summary Judgment, with all other dates in this Court's Procedural Order For Social
23 Security Review Actions extended accordingly.
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26 Date: April 25, 2016

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28 THE HONORABLE WILLIAM H. ORRICK
United States District Judge