

1 BRIAN J. STRETCH (CABN 163973)
 United States Attorney
 2 SARA WINSLOW (DCBN 457643)
 Chief, Civil Division
 3 HEATHER M. MOSS (DCBN 995773)
 Special Assistant U.S. Attorney
 4 160 Spear Street, Suite 800
 San Francisco, CA 94105
 5 Telephone: 415-977-8826
 Fax: 415-744-0134

6 Attorneys for Defendant

7 UNITED STATES DISTRICT COURT
 8 NORTHERN DISTRICT OF CALIFORNIA
 9

10 JENNIFER LYNN BELL,)	CIVIL NO. 3:16-cv-00809-MMC
11 Plaintiff,)	
12 vs.)	STIPULATION AND PROPOSED
13 CAROLYN W. COLVIN,)	ORDER FOR EXTENSION OF TIME
14 Acting Commissioner of Social Security,)	
15 Defendant.)	

17
 18 IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of
 19 record, that Defendant shall have an extension of time of 30 days, until August 28, 2016, to file a
 20 response to Plaintiff's Motion for Summary Judgement. This first extension is needed due to the size of
 21 the administrative record, and to adequately address the numerous issues and contentions raised.
 22 Additionally, the undersigned will be on previously approved leave (which includes international
 23 travel) and has a voluminous caseload (which includes active Bankruptcy cases and employment
 24 matters before the Equal Employment Opportunity Commission). Counsel for Defendant sincerely
 25 apologizes for any inconvenience this may cause.
 26

27 //

28 Stip. & ~~Prop.~~ Order for Ext., 3:16-cv-00809-MMC 1

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Respectfully submitted,

Dated: July 26, 2016

By: /s/ William D. Namnath*
WILLIAM D. NAMNATH
Attorney for Plaintiff
(*as authorized by email on July 26, 2016)

Dated: July 26, 2016

BRIAN J. STRETCH
United States Attorney
SARA WINSLOW
Chief, Civil Division
By: /s/ Heather M. Moss
HEATHER M. MOSS
Special Assistant United States Attorney
Attorneys for Defendant


Of Counsel:

DEBORAH LEE STACHEL,
Acting Regional Chief Counsel

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: July 26, 2016



THE HONORABLE HON. MAXINE M. CHESNEY
UNITED STATES DISTRICT COURT JUDGE