BRIAN STRETCH, SBN CA 163793 1 United States Attorney SARA WINSLOW, ĎCBN 457643 2 Chief of the Civil Division 3 DEBORAH STACHEL, SBN CA 230138 Regional Chief Counsel, Region IX Social Security Administration 4 JENNIFER KENNEY, SBN CA 241625 5 Special Assistant United States Attorney 160 Spear Street, Suite 800 San Francisco, California 94105 6 Telephone: (415) 977-8945 Facsimile: (415) 744-0134 7 E-Mail: jennifer.a.kenney@ssa.gov 8 UNITED STATES DISTRICT COURT 9 NORTHERN DISTRICT OF CALIFORNIA 10 11 CIVIL NO. 3:17-CV-00129-JST JENNIFER PIRACHA. 12 Plaintiff. STIPULATION TO EXTEND 13 DEFENDANT'S TIME TO FILE HER VS. MOTION FOR SUMMARY 14 JUDGMENT (FIRST REQUEST) NANCY A. BERRYHILL, 15 AND (PROPOSED) ORDER Acting Commissioner of Social Security, 16 Defendant. 17 18 19 TO THE HONORABLE JON S. TIGAR, DISTRICT JUDGE OF THE DISTRICT COURT: 20 The parties, through their undersigned attorneys, and with the approval of the Court, stipulate to 21 extend Defendant's time to file her motion for summary judgment by two weeks (14 days), from 22 September 5, 2017 to September 19, 2017. Defendant respectfully requests this first extension of time 2.3 24 due to a significant, unexpected increase in workload, including taking over an employment law matter 25 in the middle of litigation from a colleague experiencing a personal emergency. This is in addition to 26 Defendant's counsel's already extremely busy workload, including more than a dozen pending Ninth 27 28 Stip. & Proposed Order for Extension, 3:17-CV-00129-JST 1

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1	Circuit and district court cases, and other employment law matters in litigation before the Equal	
2	Employment Opportunity Commission and the Merit System Protection Board.	
3	The parties further stipulate that Plaintiff shall have an additional two weeks (14 days) to file a	
4	Reply because Plaintiff's attorney will be out of the office on a planned vacation from September 23	
5		
6	through October 9. The new due date of Plaintiff's Reply is October 17, 2017.	
7	Re	espectfully submitted,
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9		/* Donald Medearis ONALD MEDEARIS
10	(*	authorized by email on Sept. 1, 2017)
11	A	ttorneys for Plaintiff
12	Date: September 1, 2017 BJ	
13	11	RIAN STRETCH nited States Attorney
14	By: <u>/s</u>	Jennifer A. Kenney
15	JE	ENNIFER A. KENNEY
16	SI	pecial Assistant United States Attorney
17		<u>ORDER</u>
18	PURSUANT TO STIPULATION, IT IS	S SO ORDERED:
19		
20	Dated: September 5, 2017	and Jegan
21		ON. JON S. TIGAR NITED STATES DISTRICT JUDGE
22		MILD SIMILS DISTRICT TODGE
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