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9 Attorneys for Defendant

10 UNITED STATES DISTRICT COURT
 11 NORTHERN DISTRICT OF CALIFORNIA

12 REGGIE CRANE,

13 Plaintiff,

14 vs.

15 NANCY A. BERRYHILL,
 16 Acting Commissioner of Social Security,

17 Defendant.

) Case No.: 3:17-cv-01433-WHO

) STIPULATION FOR AN EXTENSION OF
) TIME OF 45 DAYS FOR DEFENDANT'S
) RESPONSE TO PLAINTIFF'S MOTION
) FOR SUMMARY JUDGMENT

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 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 an additional 45 days to
 22 respond to Plaintiff's motion for summary judgment. This is the first continuance sought by
 23 Defendant. The current due date is October 13, 2017. The new due date will be November 27,
 24 2017.

25 There is good cause for this request. Since the filing of Plaintiff's motion for summary
 26 judgment, Defendant's counsel has been diligently addressing her full workload including
 27 several district court cases and one Equal Employment Opportunity Commission matter
 28 involving discovery, depositions, and travel. In addition, in October, Defendant's counsel was

1 assigned additional unanticipated matters that involved hearing and witness preparation. Despite
2 counsel's diligence in responding to the new matters and her remaining workload, counsel was
3 set back in addressing a number of her cases, including this one and other cases that have been
4 extended. Furthermore, Defendant's counsel will be traveling for work, attending two hearings,
5 and conducting additional depositions in the remainder of October and November.

6 Therefore, Defendant is respectfully requesting additional time up to and including
7 November 27, 2017, to fully review the record and research the issues presented by Plaintiff's
8 motion for summary judgment in this case. This request is made in good faith with no intention
9 to unduly delay the proceedings.

10 The parties further stipulate that the Court's Scheduling Order shall be modified
11 accordingly.

12 Respectfully submitted,

13 Date: October 12, 2017

TONY ARJO, ATTORNEY AT LAW

14
15 s/ Tony Arjo by C.Chen*
16 (As authorized by phone on 10/12/2017)
17 TONY ARJO
18 Attorney for Plaintiff

19 Date: October 12, 2017

BRIAN J. STRETCH
United States Attorney


20 By s/ Carolyn B. Chen
21 CAROLYN B. CHEN
22 Special Assistant U. S. Attorney

Attorneys for Defendant

23
24 ORDER

25 APPROVED AND SO ORDERED:

26 DATED: October 13, 2017

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28 HON. WILLIAM H. ORRICK
UNITED STATES DISTRICT JUDGE