27

28

BRIAN J. STRETCH, CSBN 163973 1 **United States Attorney** DEBORAH LEE STACHEL, CSBN 230138 2 Regional Chief Counsel, Region IX 3 Social Security Administration CAROLYN B. CHEN, CSBN 256628 4 Special Assistant United States Attorney 5 160 Spear Street, Suite 800 6 San Francisco, California 94105 Telephone: (415) 977-8956 7 Facsimile: (415) 744-0134 E-Mail: Carolyn.Chen@ssa.gov 8 9 Attorneys for Defendant UNITED STATES DISTRICT COURT 10 NORTHERN DISTRICT OF CALIFORNIA 11 12 Case No.: 3:17-cv-01586-JST SALLY TORREZ, 13 STIPULATION FOR AN EXTENSION OF Plaintiff, TIME OF 60 DAYS FOR DEFENDANT'S 14 RESPONSE TO PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT 15 NANCY A. BERRYHILL, Acting Commissioner of Social Security, 16 17 Defendant. 18 IT IS HEREBY STIPULATED, by and between the parties, through their respective 19 counsel of record, that Defendant shall have an extension of time of an additional 60 days to 20 respond to Plaintiff's motion for summary judgment. This is the first continuance sought by 21 Defendant. The current due date is August 31, 2017. The new due date will be October 30, 22 2017. 23 There is good cause for this request. Since the filing of Plaintiff's Motion for Summary 24 Judgment on August 3, 2017, Defendant's counsel has been diligently addressing her full 25 workload and was assigned additional and unanticipated matters that had immediate deadlines 26

and could not be assigned to another attorney, including filing objections or motions in response

two district court decisions decided on July 31, 2017, and August 4, 2017, with deadlines that

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		
	П	

26

27

28

could not be extended. Despite counsel's diligence in responding to the new matters and her remaining workload, counsel was set back in addressing her other cases, including this one. Moreover, in the next 60 days, Defendant's counsel will be addressing other cases that have previously been extended, new assignments that have deadlines that cannot be extended, as well as an Equal Employment Opportunity Commission matter involving discovery and travel for depositions and subsequent briefing, that has also been extended once. Therefore, Defendant is respectfully requesting additional time up to and including October 30, 2017, to fully review the record and research the issues presented by Plaintiff's motion for summary judgment in this case. This request is made in good faith with no intention to unduly delay the proceedings. Defendant apologizes for the delay and any inconvenience caused by the delay.

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

Respectfully submitted,

Date: August 29, 2017 HOMELESS ACTION CENTER

s/ Paul Kim by C.Chen*(As authorized by e-mail on 8/29/2017)PAUL KIMAttorney for Plaintiff

BRIAN J. STRETCH United States Attorney

By <u>s/Carolyn B. Chen</u> CAROLYN B. CHEN Special Assistant U. S. Attorney

Attorneys for Defendant

ORDER

APPROVED AND SO ORDERED:

DATED: August 29, 2017

Date: August 29, 2017

HON JON S. TIGAR UNITED STATES DISTRICT JUDGE