

160 Spear Street, Suite 800
San Francisco, California 94105
Telephone: (415) 977-8956
Facsimile: (415) 744-0134
E-Mail: Carolyn.Chen@ssa.gov

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

Defendant.

STIPULATION FOR AN EXTENSION OF
TIME OF 60 DAYS FOR DEFENDANT'S
RESPONSE TO PLAINTIFF'S MOTION
FOR SUMMARY JUDGMENT

There is good cause for this request. Since the filing of Plaintiff's Motion for Summary Judgment on August 3, 2017, Defendant's counsel has been diligently addressing her full workload and was assigned additional and unanticipated matters that had immediate deadlines and could not be assigned to another attorney, including filing objections or motions in response to two district court decisions decided on July 31, 2017, and August 4, 2017, with deadlines that

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

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

13 Respectfully submitted,

14 Date: August 29, 2017

HOMELESS ACTION CENTER

15 s/ Paul Kim by C.Chen*

16 (As authorized by e-mail on 8/29/2017)

17 PAUL KIM

Attorney for Plaintiff

18 Date: August 29, 2017

BRIAN J. STRETCH

United States Attorney

20 By s/ Carolyn B. Chen

21 CAROLYN B. CHEN


Special Assistant U. S. Attorney

22 Attorneys for Defendant

23
24 ORDER

25 APPROVED AND SO ORDERED:

26 DATED: August 29, 2017

27 
28 HON. JON S. TIGAR
UNITED STATES DISTRICT JUDGE