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 9 **UNITED STATES DISTRICT COURT**
 10 **NORTHERN DISTRICT OF CALIFORNIA**

12	NICOLE BLOCK,)	Case No.: 4:16-cv-02381-KAW
13	Plaintiff,)	
14	vs.)	JOINT STUPULATION AND
15	NANCY A. BERRYHILL,)	[PROPOSED] ORDER FOR EXTENSION
16	Acting Commissioner of Social Security,)	OF TIME
17	Defendant.)	

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 19 Defendant Nancy A. Berryhill, Acting Commissioner of Social Security (“Defendant”)
 20 respectfully requests that the Court extend the time for Defendant to file her Opposition to
 21 Plaintiff’s Opening Brief, originally due on June 6, 2017, by 14 days, through and including
 22 Tuesday, June 20, 2017. This is the Commissioner’s second request for an extension of time in
 23 this matter.

24 An extension of time is needed due to the exceptionally complex nature of the
 25 administrative decision in this case, which involved a combination of medically-equaling
 26 multiple disability listings, a finding of drug and alcohol abuse (DAA) precluding an earlier
 27 finding of disability, and a partial award of benefits. This exceptional combination of multiple
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1 listings, a DAA finding, and a partial award of benefits, necessitates additional review and
2 analysis by the agency and the undersigned, resulting in the request for a second brief extension
3 of time. This request is made in good faith with no intention to unduly delay the proceedings.
4 Counsel's office conferred with Plaintiff's counsel, who had no objection to this request, on June
5 2, 2017.

6 Respectfully submitted this 5th day of June, 2017.

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8 BRIAN STRETCH
9 United States Attorney
10 DEBORAH STACHEL
11 Regional Chief Counsel, Region IX

12 By /s/ Adam Lazar
13 ADAM LAZAR
14 Special Assistant U.S. Attorney
15 Attorneys for Defendant

16 **ORDER**

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18 IT IS SO ORDERED.

19
20 Date: 6/6/17

21 By: Kandis Westmore
22 THE HON. KANDIS A. WESTMORE
23 UNITED STATES MAGISTRATE JUDGE
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