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8 Attorneys for Defendant

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

13 GRACIELA LIZARDI ESTRADA, ) Case No.: 5:16-cv-06998-EJD  
 14 )  
 Plaintiff, ) **JOINT STUPULATION AND**  
 15 ) **[PROPOSED] ORDER FOR EXTENSION**  
 vs. ) **OF TIME**  
 16 )  
 17 NANCY A. BERRYHILL )  
 Acting Commissioner of Social Security, )  
 18 )  
 19 Defendant. )

20  
 21 Defendant Nancy A. Berryhill, Acting Commissioner of Social Security (“Defendant”)  
 22 respectfully requests that the Court extend the time for Defendant to file her Opposition to  
 23 Plaintiff’s Opening Brief, originally due on June 15, 2017, by 30 days, through and including  
 24 Monday, July 17, 2017 (30 days falls on the preceding weekend). This is the Commissioner’s  
 25 first request for an extension of time in this matter.

26 An extension of time is needed in order to prepare Defendant’s opposition because of the  
 27 drafting attorney’s workload in the current two-week period, including a Ninth Circuit answering  
 28 brief, two summary judgment motions, an EAJA opposition, and a motion to remand, in addition  
 to the brief due in this matter. In addition, counsel is getting married on June 24, which has

1 caused significant additional pressure on counsel's schedule. This request is made in good faith  
2 with no intention to unduly delay the proceedings.

3 Counsel's office conferred with Plaintiff's counsel, who had no objection to this request,  
4 on June 21, 2017.

5  
6 Respectfully submitted,

7 Dated: June 21, 2017

8 BRIAN STRETCH  
9 United States Attorney  
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11 Regional Chief Counsel, Region IX  
12 Social Security Administration

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

17 **ORDER**

18 IT IS SO ORDERED.

19 Date: June 21, 2017

20 By:   
21 THE HON. EDWARD J. DAVILA  
22 UNITED STATES MAGISTRATE JUDGE  
23  
24  
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