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5 Attorneys for Plaintiff  
REGINAL MAE TURNER  
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9 **UNITED STATES DISTRICT COURT**  
10 **EASTERN DISTRICT OF CALIFORNIA**

11 REGINAL MAE TURNER ) Case No.: 1:17-cv-00022-GSA  
12 )  
Plaintiff, )  
13 v. ) STIPULATION TO EXTEND TIME  
TO FILE APPELLANT'S OPENING  
14 NANCY A. BERRYHILL, Acting )  
Commissioner of Social Security. ) BRIEF  
15 ) (FIRST REQUEST)  
Defendant. )  
16 )  
17 )  
18 )

19 Plaintiff Reginal Mae Turner and Defendant Carolyn W. Colvin, Acting  
20 Commissioner of Social Security, through their undersigned attorneys, stipulate,  
21 subject to this court's approval, to extend the time by 28 days from August 30,  
22 2017 to October 30, 2017 for Plaintiff to file a Appellant's Opening Brief, with all  
23 other dates in the Court's Order Concerning Review Of Social Security Cases  
24 extended accordingly. This request is made at the request of Plaintiff's counsel to  
25 allow additional time to fully research the issues presented. Counsel currently has  
26

1 11 motions overdue and is trying to complete all as soon as possible. Counsel's  
2 firm lost an attorney last June 2016. Counsel has hired four attorneys' to handle  
3 that attorney's caseload consecutively and the last one left on Friday. This matter  
4 had been reassigned to the attorney who left on Friday, September 1, 2017.  
5 Counsel has been trying to do as many motions as possible but remains committed  
6 to giving each case the time and focus required to present the best argument  
7 possible on the client's behalf. Counsel appreciates that courtesy and patience of  
8 the defendant and this court and counsel assures the court that she continues to  
9 zealously represent her clients as best possible under the circumstances. Counsel  
10 requests this extension in good faith.

11 DATE: September 5, 2017

Respectfully submitted,

LAWRENCE D. ROHLFING

*/s/ Denise Bourgeois Haley*

12  
13 BY: \_\_\_\_\_

Denise Bourgeois Haley

Attorney for plaintiff Reginal Mae Turner

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16 DATE: September 5, 2017

PHILLIP A. TALBET

United States Attorney

DEBORAH LEE STACHEL

Regional Chief Counsel

Social Security Administration

*/s/ Sharon Lahey*

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21 BY: \_\_\_\_\_

Sharon Lahey

Special Assistant United States Attorney

Attorneys for defendant Nancy A. Berryhill

\*authorized by e-mail

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**ORDER**

Pursuant to the stipulation of the parties (Doc. 13), Plaintiff's Opening Brief shall be filed no later than October 30, 2017. All other dates in the Scheduling Order dated January 9, 2017 (Doc. 5) shall be modified accordingly.

IT IS SO ORDERED.

Dated: September 8, 2017

/s/ Gary S. Austin  
UNITED STATES MAGISTRATE JUDGE