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8 Attorneys for Plaintiff
9 VICTORIA ANN CASTRO

10 **UNITED STATES DISTRICT COURT**
11 **EASTERN DISTRICT OF CALIFORNIA**

12 VICTORIA ANN CASTRO) Case No.: 1:17-cv-00025-BAM
13)
14 Plaintiff,) STIPULATION AND ORDER TO EXTEND
15 vs.) TIME TO FILE OPENING BRIEF
16)
17 NANCY A. BERRYHILL, Acting) (FIRST REQUEST)
18 Commissioner of Social Security.)
19)
20 Defendant.)
21)

22 Plaintiff Victoria Ann Castro and Defendant Carolyn W. Colvin, Acting Commissioner
23 of Social Security, through their undersigned attorneys, stipulate, subject to this court's approval,
24 to extend the time by 28 days from September 5, 2017 to October 5, 2017 for Plaintiff to file a
25 Opening Brief, with all other dates in the Court's Order Concerning Review Of Social Security
26 Cases extended accordingly. This request is made at the request of Plaintiff's counsel to allow
additional time to fully research the issues presented. Counsel currently has 11 motions overdue
and is trying to complete all as soon as possible. Counsel's firm lost an attorney last June 2016.
Counsel has hired four attorneys' to handle that attorney's caseload consecutively and the last
one left on Friday. Counsel has been trying to do as many as possible but remains committed to
giving each case the time and focus required to present the best argument possible on the client's

1 behalf. Counsel appreciates that courtesy and patience of the defendant and this court and
2 counsel assures the court that she continues to zealously represent her clients as best possible
3 under the circumstances. Counsel requests this extension in good faith.

4 DATE: September 5, 2017

Respectfully submitted,

5 LAWRENCE D. ROHLFING

6 /s/ *Denise Bourgeois Haley*

7 BY: _____

Denise Bourgeois Haley
8 Attorney for plaintiff Ms. Victoria Ann Castro

9 DATE: September 5, 2017

PHILLIP A. TALBET

10 United States Attorney
11 DEBORAH LEE STACHEL
12 Regional Chief Counsel
13 Social Security Administration

14 /s/ *Tina Naicker*

15 BY: _____

Tina Naicker
16 Special Assistant United States Attorney
17 Attorneys for defendant Nancy A. Berryhill
18 [*authorized by e-mail]

19 **ORDER**

20 Based upon the stipulation of the parties, and for cause shown, IT IS HEREBY
21 ORDERED that Plaintiff shall have an extension of time, to and including October 5, 2017, in
22 which to file Plaintiff's Opening Brief; and that all other deadlines set forth in the Case
23 Management Order shall be extended accordingly.

24 IT IS SO ORDERED.

25 Dated: September 11, 2017

26 /s/ *Barbara A. McAuliffe*
UNITED STATES MAGISTRATE JUDGE