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10 **UNITED STATES DISTRICT COURT**
11 **EASTERN DISTRICT OF CALIFORNIA**
12 **FRESNO DIVISION**

13 STACEY LYN SCHAEFERS,) Case No.: 1:17-cv-00648-EPG
14 Plaintiff,)
15 v.) **STIPULATION AND ORDER TO**
16) **EXTEND BRIEFING SCHEDULE**
17 NANCY A. BERRYHILL,)
18 Deputy Commissioner for Operations,)
19 performing the duties and functions not)
reserved to the Commissioner of Social)
Security,)
20 Defendant.

21
22 IT IS HEREBY STIPULATED by the parties, through their undersigned attorneys, to
23 extend Defendant's time to file her responsive brief with the Court by 10 days to **April 9, 2018**,
24 and that all other scheduling dates set forth in the Court's Case Management Order shall be
25 extended accordingly. This is Defendant's first request for an extension of time in this matter
26 and she requests it in good faith and without any intent to prolong proceedings unduly.

27 There is good cause for this extension request because counsel for Defendant has had
28 leave and workload issues that preclude filing her responsive brief by March 29, 2018. In

1 particular, counsel for Defendant was on leave from March 15 through March 23, 2018, and is
2 presently unable to fully review the record and prepare the Commissioner's responsive brief
3 before the March 29, 2018, deadline. Furthermore, counsel for Defendant has other pending
4 workload issues that preclude filing the Commissioner's responsive brief by the presently
5 scheduled deadline, such as drafting briefs and summary judgment motions and negotiating (or
6 litigating) attorney fee matters pursuant to the Equal Access to Justice Act before the district
7 courts within the Ninth Circuit, finalizing discovery and preparing substantive pleadings in
8 personnel-related litigation pending before the Equal Employment Opportunity Commission
9 (EEOC), and preparing for an arbitration proceeding involving the agency and one of the
10 agency's collective bargaining units.

11 Counsel for Defendant apologizes to Plaintiff and the Court for any inconvenience caused
12 by this delay.

13 Respectfully submitted,

14
15 Date: March 26, 2018

LAW OFFICES OF LAWRENCE D.
ROHLFING

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17 By: /s/ Asim H. Modi for Monica Perales*
MONICA PERALES
18 *Authorized by email on March 26, 2018
Attorneys for Plaintiff

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20 Date: March 26, 2018

MCGREGOR W. SCOTT
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DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

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23 By: /s/ Asim H. Modi
ASIM H. MODI
24 Special Assistant United States Attorney
25 Attorneys for Defendant
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ORDER

Pursuant to the parties' stipulation, Defendant's time to file its responsive brief with the Court is EXTENDED by 10 days to April 9, 2018, and all other scheduling dates set forth in the Court's Case Management Order are EXTENDED accordingly.

IT IS SO ORDERED.

Dated: March 26, 2018

/s/ Eric P. Grogan
UNITED STATES MAGISTRATE JUDGE

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