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8 Attorneys for Defendant

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

11
 12 YVONNE JANETTA TUNSTALL,
 13 Plaintiff,
 14 vs.
 15 NANCY A. BERRYHILL,
 Acting Commissioner of Social Security
 16 Defendant.
 17

) Case No.: 1:17-cv-00922-BAM
)
) **JOINT STIPULATION AND ORDER FOR**
) **EXTENSION OF TIME FOR**
) **DEFENDANT TO RESPOND TO**
) **PLAINTIFF'S MOTION FOR SUMMARY**
) **JUDGMENT**

19
 20 IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record,
 21 that the time for responding to Plaintiff's Motion for Summary Judgment be extended from May
 22 7, 2018 to **June 7, 2018**. This is Defendant's first request for extension. Good cause exists to
 23 grant Defendant's request for extension. Counsel has been on intermittent medical leave due to
 24 her chronic migraines, which impair her vision. Counsel has over 75+ pending social security
 25 cases, which require two or more dispositive motions a week until late June. Counsel also has
 26 Ninth Circuit matters that requires additional levels of review and three pending civil rights
 27 matters, which require imminent attention and investigation. Due to current workload demands
 28 and unanticipated leave, Counsel became behind on her heavy caseload and needs additional

1 time to adequately review the transcript and properly respond to Plaintiff's Motion for Summary
2 Judgment. Defendant makes this request in good faith with no intention to unduly delay the
3 proceedings. The parties further stipulate that the Court's Scheduling Order shall be modified
4 accordingly.

5 Respectfully submitted,

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7 Dated: May 2, 2018

s/ *Cyrus Safa
(*as authorized by email on May 2, 2018)
CYRUS SAFA
Attorney for Plaintiff

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10
11 Dated: May 2, 2018

McGREGOR W. SCOTT
Acting United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
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15 By /s/ Tina L. Naicker
16 TINA L. NAICKER
17 Special Assistant U.S. Attorney
18 Attorneys for Defendant

19 **ORDER**

20 Based upon the stipulation of the parties, and for cause shown, IT IS HEREBY
21 ORDERED, that Defendant shall have an extension of time, to and including **June 7, 2018**, in
22 which to file a response Plaintiff's Opening Brief; and that all other deadlines set forth in the
23 Court's Scheduling Order shall be extended accordingly.

24 IT IS SO ORDERED.

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26 Dated: May 3, 2018

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE

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