1 2 3 4 5 6 7 8	MCGREGOR W. SCOTT United States Attorney DEBORAH LEE STACHEL Regional Chief Counsel, Region IX Social Security Administration TINA L. NAICKER, CSBN 252766 Special Assistant United States Attorney 160 Spear Street, Suite 800 San Francisco, California 94105 Telephone: (415) 268-5611 Facsimile: (415) 744-0134 E-Mail: Tina.Naicker@SSA.gov  Attorneys for Defendant		
9	UNITED STATES DISTRICT COURT		
10	EASTERN DISTRICT OF CALIFORNIA		
11	SACRAMENTO DIVISION		
12		C N 117 00000 DAN	
13	YVONNE JANETTA TUNSTALL,	Case No.: 1:17-cv-00922-BAM	
14	Plaintiff,	<ul><li>JOINT STIPULATION AND ORDER FOR</li><li>EXTENSION OF TIME FOR</li><li>DEFENDANT TO RESPOND TO</li></ul>	
15	vs. NANCY A. BERRYHILL,	) PLAINTIFF'S MOTION FOR SUMMARY ) JUDGMENT	
16	Acting Commissioner of Social Security	) )	
17	Defendant.		
18			
19			
20			
21	IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record,		
22	that the time for responding to Plaintiff's Motion for Summary Judgment be extended from June		
23	7, 2018 to <u>July 13, 2018</u> . This is Defendant's second request for extension. Good cause exists		
24	to grant Defendant's request for extension. Due to Counsel's ongoing medical issues and		
25	unanticipated leave, Counsel respectfully requests additional time to respond to Plaintiff's		
26	Motion for Summary Judgment, as she became behind on her heavy caseload. Counsel has over		
27	75+ pending social security cases, which require two or more dispositive motions a week until		
28	late June. Counsel also has a Ninth Circuit matter that requires additional levels of review,		
	JS for Extension of Time	Case No. 1:17-cv-00922-BAM	

1	several pending civil rights matters, which require imminent attention and investigation, and a		
2	legal opinion, which requires significant research for agency review. Defendant makes this		
3	request in good faith with no intention to unduly delay the proceedings. The parties further		
4	stipulate that the Court's Scheduling Order shall be modified accordingly.		
5		Respectfully submitted,	
6			
7	Dated: June 4, 2018	s/*Cyrus Safa (*as authorized by email on June 4, 2018)	
8		CYRUS SAFA	
9		Attorney for Plaintiff	
10			
11	Dated: June 4, 2018	McGREGOR W. SCOTT	
12	Dated. Julie 4, 2018	Acting United States Attorney	
13		DEBORAH LEE STACHEL Regional Chief Counsel, Region IX	
14		Social Security Administration	
15			
16	Ву	/s/ Tina L. Naicker TINA L. NAICKER	
17		Special Assistant U.S. Attorney	
18		Attorneys for Defendant	
19		ORDER	
20	Based on the parties' stipulation, and for cause shown, IT IS HEREBY ORDERED that		
21	Defendant shall have an extension of time to July 13, 2018, to file a response to Plaintiff's		
22	opening brief. All other deadlines set forth in the Court's Scheduling Order shall be extended		
23	accordingly. No further extensions of time shall be granted absent a showing of good cause.		
24		man be granted absent a snowing of good cause.	
	IT IS SO ORDERED.		
25	D . 1 Toma 5 2010	In Parlace A. M.A. I. II.	
26	Dated: <b>June 5, 2018</b>	/s/ <b>Barbara A. McAuliff</b> UNITED STATES MAGISTRATE JUDGE	
27			
28	II		