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

12
13 ROBERT ZENATY,) Case No.: 1:17-cv-01362-BAM
14 Plaintiff,)
15 vs.) STIPULATION AND ORDER FOR AN
16 NANCY A. BERRYHILL,) EXTENSION OF TIME OF 60 DAYS FOR
Acting Commissioner of Social Security,) DEFENDANT’S RESPONSE TO
17 Defendant.) PLAINTIFF’S OPENING BRIEF
18)

19
20 IT IS HEREBY STIPULATED, by and between the parties, through their respective
21 counsel of record, that Defendant shall have an extension of time of 60 additional days to
22 respond to Plaintiff’s opening brief. The current due date is July 20, 2018. The new due date
23 will be September 18, 2018.

24 This is Defendant’s first request for an extension of time in this case. There is good
25 cause for this request. Since the filing of Plaintiff’s opening brief, Defendant’s counsel has been
26 diligently addressing her full workload of district court cases and other cases that could not be
27 assigned to another attorney. Furthermore, Defendant’s counsel will be on approved leave for
28 approximately four weeks from July to August.

1 Thus, Defendant is respectfully requesting additional time up to and including September
2 18, 2018, to fully review the record and research the issues presented by Plaintiff's opening brief
3 in this case. This request is made in good faith with no intention to unduly delay the
4 proceedings.

5
6 Respectfully submitted,

7 Date: July 16, 2018

LAW OFFICES OF HARRY J. BINDER AND
CHARLES E. BINDER, P.C.

9 s/ Shanny J. Lee by C.Chen*
10 (As authorized by email on 7/16/2018)
11 SHANNY J. LEE
Attorneys for Plaintiff

12 Date: July 16, 2018

MCGREGOR W. SCOTT
United States Attorney

14 By s/ Carolyn B. Chen
15 CAROLYN B. CHEN
Special Assistant U. S. Attorney

16 Attorneys for Defendant
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19 ORDER

20 Pursuant to the parties' stipulation, and for cause shown, IT IS HEREBY ORDERED that
21 Defendant shall have an extension of time to September 18, 2018, in which to file a response to
22 Plaintiff's opening brief. All other deadlines set forth in the Court's Scheduling Order shall be
23 extended accordingly.
24 IT IS SO ORDERED.

25 Dated: July 17, 2018

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