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9 Attorneys for Defendant

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

13 ALMA LOPEZ,) Case No. 1:17-cv-01501-BAM
14)
Plaintiff,) STIPULATION AND ORDER FOR AN
15) EXTENSION OF TIME (FIRST REQUEST)
vs.)
16 NANCY A. BERRYHILL,)
Acting Commissioner of Social Security,)
17)
18 Defendant.)
19

20 IT IS HEREBY STIPULATED, by and between the parties, through their respective
21 counsel of record, that Defendant's time to file her Responsive Brief be extended from July 19,
22 2018, to August 17, 2018, and Plaintiff's time for filing a Reply Brief be extended to September
23 21, 2018. This is the parties' first request for an extension of time in this matter.

24 Defendant respectfully requests additional time to file her Responsive Brief because the
25 Of Counsel for Defendant is a fairly recent hire who just received this case assignment and needs
26 sufficient time to review the record, to evaluate the issues raised in Plaintiff's motion, and to
27 prepare Defendant's response to the motion.
28

1 Plaintiff respectfully requests additional time to file her Reply Brief because her counsel
2 will be on maternity leave through mid-September and needs sufficient time to prepare the brief
3 upon return.

4 The parties' request is made in good faith and with no intention to unduly delay the
5 proceedings, and counsel apologizes for any inconvenience.

6 It is therefore respectfully requested that Defendant be granted an extension of time to
7 file her Responsive Brief, through and including August 17, 2018, and that Plaintiff be granted
8 an extension of time to file her Reply Brief, through and including September 21, 2018.

9 Respectfully submitted,

10 Dated: July 17, 2018

11 /s/ Michelle Shvarts
12 (*as authorized via email on July 17, 2018)
13 MICHELLE SHVARTS
14 Attorney for Plaintiff

15 Dated: July 17, 2018

16 MCGREGOR W. SCOTT
17 United States Attorney
18 DEBORAH LEE STACHEL
19 Regional Chief Counsel, Region IX
20 Social Security Administration

21 By: /s/ Shea Lita Bond
22 SHEA LITA BOND
23 Special Assistant U.S. Attorney
24 Attorneys for Defendant

25 ORDER

26 Pursuant to the parties' stipulation, and good cause appearing, IT IS HEREBY
27 ORDERED that Defendant shall have an extension of time to August 17, 2018, to file a response
28 brief, and Plaintiff shall have an extension of time to September 21, 2018, to file a reply brief.
IT IS SO ORDERED.

Dated: July 18, 2018

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE