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

13 JULIE ANN HARRELL,) Case No.: 1:17-cv-1503-GSA
14 Plaintiff,)
15 v.) **STIPULATION AND ORDER TO**
16) **EXTEND BRIEFING SCHEDULE**
17 NANCY A. BERRYHILL,)
Acting Commissioner of Social Security,)
18 Defendant.)
19)

20 IT IS HEREBY STIPULATED by the parties, through their undersigned attorneys, to
21 extend Defendant's time to file her brief with the Court by **30 days to October 22, 2018**, and
22 that all other scheduling dates set forth in the Court's Case Management Order shall be extended
23 accordingly. This is Defendant's first request for an extension of time in this matter and she
24 requests it in good faith and without any intent to prolong proceedings unduly.

25 There is good cause for this extension request because counsel for Defendant has
26 workload issues that preclude filing her cross-motion by September 21, 2018. In particular,
27 counsel for Defendant is currently responsible for performing an extensive range of tasks, such
28 as: preparing for an oral argument in a Social Security case before the Ninth Circuit; drafting

1 briefs and summary judgment motions (including one due today and two others due by the end of
2 the month) in Social Security cases before the district courts within the Ninth Circuit, negotiating
3 (or litigating) attorney fee matters pursuant to the Equal Access to Justice Act before the district
4 courts within the Ninth Circuit; drafting a post-hearing brief for an arbitration proceeding
5 involving the agency and one of the agency's collective bargaining units; and assisting with
6 implementing the terms of the class action settlement reached in *Hart v. Berryhill* (N.D.Cal. No.
7 3:15-cv-623-JST).

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

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11 Respectfully submitted,

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13 Date: September 14, 2018

LAW OFFICES OF LAWRENCE D. ROHLFING

14 By: /s/ Asim H. Modi for Monica Perales*

MONICA PERALES

*Authorized by email on September 14, 2018

Attorney for Plaintiff

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16
17 Date: September 14, 2018

MCGREGOR W. SCOTT

United States Attorney

DEBORAH LEE STACHEL

Regional Chief Counsel, Region IX

Social Security Administration

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21 By: /s/ Asim H. Modi

ASIM H. MODI

Special Assistant United States Attorney

Attorneys for Defendant

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24 IT IS SO ORDERED.

25 Dated: September 17, 2018

/s/ Gary S. Austin

UNITED STATES MAGISTRATE JUDGE