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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 November 21, 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 second 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 brief by October 22, 2018. In particular, counsel for  
27 Defendant is currently responsible for performing an extensive range of tasks, such as: preparing  
28 for an oral arguments in three Social Security cases before the District of Hawaii at the end of the

1 month, drafting briefs and summary judgment motions in Social Security cases before the district  
2 courts within the Ninth Circuit, negotiating (or litigating) attorney fee matters pursuant to the  
3 Equal Access to Justice Act before the district courts within the Ninth Circuit (including one  
4 brief due next week); preparing and delivering a presentation to the Social Security  
5 Administration's Office of Hearing Operations; drafting a post-hearing brief for an arbitration  
6 proceeding involving the agency and one of the agency's collective bargaining units; and  
7 assisting with implementing the terms of the class action settlement reached in *Hart v. Berryhill*  
8 (N.D.Cal. No. 3:15-cv-623-JST). Also, counsel for Defendant presented an oral argument to the  
9 Ninth Circuit in a Social Security case on October 10, 2018; substantive preparation and travel to  
10 Honolulu, Hawaii for this argument has hindered review of the record and preparation of the  
11 responsive brief in the instant case.

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

14  
15 Respectfully submitted,

16  
17 Date: October 16, 2018

LAW OFFICES OF LAWRENCE D. ROHLFING

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

MONICA PERALES

\*Authorized by email on October 16, 2018

Attorney for Plaintiff

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21 Date: October 16, 2018

MCGREGOR W. SCOTT

United States Attorney

DEBORAH LEE STACHEL

Regional Chief Counsel, Region IX

Social Security Administration

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25 By: /s/ Asim H. Modi

ASIM H. MODI

Special Assistant United States Attorney

Attorneys for Defendant

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IT IS SO ORDERED.

Dated: October 17, 2018

/s/ Gary S. Austin  
UNITED STATES MAGISTRATE JUDGE