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1 MCGREGOR W. SCOTT United States Attorney DEBORAH LEE STACHEL Regional Chief Counsel, Region IX Social Security Administration 3 Social Security Administration TINA L. NAICKER, CSBN 252766 Special Assistant United States Attorney 160 Spear Street, Suite 800 San Francisco, California 94105 5 Telephone: (415) 268-5611 Facsimile: (415) 744-0134 Facsimile: (415) 744-0134 7 E-Mail: Tina.Naicker@SSA.gov 8 Attorneys for Defendant 9 UNITED STATES DISTRICT COURT 10 EASTERN DISTRICT OF CALIFORNIA 11 FRESNO DIVISION 12 OLANE D. BROOKS, 13 DIANE D. BROOKS, 14 Plaintiff, 15 vs. 16 vs. 17 Vs. 18 Defendant.			
 9 9 UNITED STATES DISTRICT COURT 10 EASTERN DISTRICT OF CALIFORNIA 11 FRESNO DIVISION 12 13 DIANE D. BROOKS, 14 Plaintiff, Plaintiff, S. VS. NANCY A. BERRYHILL, Acting Commissioner of Social Security, Defendant. 	2 3 4 5 6	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	
Indext EASTERN DISTRICT OF CALIFORNIA Indext FRESNO DIVISION Indext FRESNO DIVISION Indext FRESNO DIVISION Indext Case No.: 1:17-cv-01506-BAM Indext DIANE D. BROOKS, Indext Plaintiff, Indext	8		
II FRESNO DIVISION II FRESNO DIVISION III Case No.: 1:17-cv-01506-BAM III Case No.: 1:17-cv-01506-BAM III DIANE D. BROOKS, III JOINT STIPULATION AND ORDER FOR IIII Plaintiff, IIII VS. IIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIIII	9	UNITED STATES DISTRICT COURT	
 DIANE D. BROOKS, DIANE D. BROOKS, Plaintiff, VS. NANCY A. BERRYHILL, Acting Commissioner of Social Security, Defendant. Case No.: 1:17-cv-01506-BAM Case No.: 1:17-cv-01506-BAM JOINT STIPULATION AND ORDER FOR DEFENDANT TO RESPOND TO PLAINTIFF'S OPENING BRIEF. 	10	EASTERN DISTRICT OF CALIFORNIA	
 DIANE D. BROOKS, Plaintiff, VS. NANCY A. BERRYHILL, Defendant. Defendant. Case No.: 1:17-cv-01506-BAM JOINT STIPULATION AND ORDER FOR BOINT STIPULATION AND ORDER FOR DEFENDANT TO RESPOND TO PLAINTIFF'S OPENING BRIEF. 	11	FRESNO DIVISION	
 DIANE D. BROOKS, Plaintiff, Vs. NANCY A. BERRYHILL, Acting Commissioner of Social Security, Defendant. Defendant. DIANE D. BROOKS, JOINT STIPULATION AND ORDER FOR BOINT STIPULATION AND ORDER FOR DEFENDANT TO RESPOND TO PLAINTIFF'S OPENING BRIEF. 	12		
14 Plaintiff,) EXTENSION OF TIME FOR 15 vs.) DEFENDANT TO RESPOND TO 15 vs.) PLAINTIFF'S OPENING BRIEF. 16 NANCY A. BERRYHILL,) 16 Acting Commissioner of Social Security,) 17 Defendant.)	13	DIANE D. BROOKS,	Case No.: 1:17-cv-01506-BAM
 15 vs.) PLAINTIFF'S OPENING BRIEF. 16 Acting Commissioner of Social Security, 17 Defendant.) 	14	Plaintiff,	EXTENSION OF TIME FOR
16 Acting Commissioner of Social Security,) 17 Defendant.)	15		
Defendant.	16	NANCY A. BERRYHILL,) Acting Commissioner of Social Security,)	
18 <u> </u>	17	Defendant.	
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IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Opening Brief be extended from September 12, 2018 to <u>October 17, 2018</u>. This is Defendant's first request for extension. Good cause exists to grant Defendant's request for extension. Counsel has had three deaths in her family since June and was out on intermittent bereavement and medical leave for a family medical emergency that required hospital admission and surgery. Counsel was also out of the office on September 7th and 8th, 2018. Counsel has over 75+ active social security matters, of which require two or more dispositive motions a week until mid October. In addition, Counsel has a Ninth Circuit matter that is due in early October. As a result of Counsel's leave and heavy workload, Defendant needs additional time to adequately review the transcript and properly respond to Plaintiff's JS for Extension of Time and PO, Case No. 1:17-cv-01506-BAM

1	Motion for Remand. Defendant makes this request in good faith with no intention to unduly	
2	delay the proceedings. Counsel apologizes for the belated request, but did not anticipate taking	
3	additional leave from the several family deaths and family medical emergency. The parties	
4	further stipulate that the Court's Scheduling Order shall be modified accordingly.	
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7	Respectfully submitted,	
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9	Dated: September 12, 2018 /s/ *Larry Rohlfing	
10	(*as authorized by email on September 12, 2018) LARRY ROHLFING	
11	Attorney for Plaintiff	
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12	Dated: September 12, 2018 MCGREGOR W. SCOTT	
	United States Attorney DEBORAH LEE STACHEL	
14	Regional Chief Counsel, Region IX	
15	Social Security Administration	
16	By <u>/s/ Tina L. Naicker</u>	
17	TINA L. NAICKER	
18	Special Assistant U.S. Attorney Attorneys for Defendant	
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20	ORDER	
21	Pursuant to the parties' stipulation, and good cause appearing, IT IS HEREBY	
22	ORDERED that Defendant shall have an extension of time to October 17, 2018, in which to file	
23	a response to Plaintiff's Opening Brief. All other deadlines set forth in the Court's Scheduling	
24	Order are extended accordingly.	
25	IT IS SO ORDERED.	
26	Dated: September 13, 2018 /s/ Barbara A. McAuliffe	
27	UNITED STATES MAGISTRATE JUDGE	
28		
	JS for Extension of Time and PO, Case No. 1:17-cv-01506-BAM	
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