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

13 MARTIN SOROKA,)	Case No.: 1:17-cv-01571-GSA
14 Plaintiff,)	
15 vs.)	STIPULATION AND PROPOSED ORDER
16 NANCY A. BERRYHILL,)	FOR AN EXTENSION OF TIME OF 30
Acting Commissioner of Social Security,)	DAYS FOR 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 30 additional days to
22 respond to Plaintiff's opening brief. The current due date is August 27, 2018. The new due date
23 will be September 26, 2018.

24 This is Defendant's first request for an extension of time in this case and the first request
25 for an extension in this case overall. There is good cause for this request. Since the filing of
26 Plaintiff's opening brief, Defendant's counsel was on leave and had planned to address her full
27 workload of district court cases and other cases, including this case, upon her return. However,
28 an unanticipated matter in another district court case that required immediate attention upon

1 Defendant's counsel's return prevented Defendant's counsel from completing Defendant's
2 responsive brief in this case by the original due date.

3 Thus, Defendant is respectfully requesting additional time up to and including September
4 26, 2018, to fully review the record and research the issues presented by Plaintiff's opening brief
5 in this case. This request is made in good faith with no intention to unduly delay the
6 proceedings.

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8 Respectfully submitted,

9 Date: August 27, 2018

LAW OFFICES OF LAWRENCE D. ROHLFING

10 *s/ Lawrence Rohlfiing by C.Chen**
11 (As authorized by email on 8/27/2018)
12 CYRUS SAFA
13 Attorneys for Plaintiff

14 Date: August 27, 2018

MCGREGOR W. SCOTT
United States Attorney

15 By *s/ Carolyn B. Chen*
16 CAROLYN B. CHEN
17 Special Assistant U. S. Attorney

18 Attorneys for Defendant

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20 IT IS SO ORDERED.

21 Dated: August 28, 2018

/s/ Gary S. Austin
22 UNITED STATES MAGISTRATE JUDGE