

1 MCGREGOR W. SCOTT
United States Attorney
2 DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
3 Social Security Administration
TINA L. NAICKER, CSBN 252766
4 Special Assistant United States Attorney
160 Spear Street, Suite 800
5 San Francisco, California 94105
Telephone: (415) 268-5611
6 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
13 CATHERINE SORIA,

14 Plaintiff,

15 v.

16 ANDREW SAUL,
17 Commissioner of Social Security,

18 Defendant.

) Case No.: 1:18-cv-00089-SKO

) **JOINT STIPULATION FOR EXTENSION**
) **OF TIME TO MODIFY BRIEFING**
) **SCHEDULE FOR MOTION FOR**
) **ATTORNEYS FEES (Dkt. 29); ORDER**

) (Doc. 32)

19
20
21 IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record,
22 that the time for responding to the Motion for Attorneys Fees Pursuant to 42 U.S.C. §406(b)
23 (Dkt. 29) be extended from April 23, 2021 to **May 21, 2021**. This is Defendant’s first request for
24 extension. Good cause exists to grant Defendant’s request for extension. After several weeks
25 of intermittent leave due to Counsel for Defendant (“Counsel”) extended family member in the
26 Intensive Care Unit (ICU), Counsel’s extended family member passed away over the weekend.
27 Counsel also has over 80+ active social security matters, in various stages of litigation, including
28 several dispositive motions and a Ninth Circuit brief due to the U.S. Attorney’s Office. Due to

1 heavy caseload, unexpected leave, and anticipated leave for funeral and prayer services, Counsel
2 needs additional time to adequately review the Motion for Attorneys Fees and provide
3 Defendant's response. . Defendant makes this request in good faith with no intention to unduly
4 delay the proceedings. Counsel apologizes for the belated request, but made her request as soon
5 as practicable, following her leave.

6 Respectfully submitted,

7
8 Dated: April 23, 2021

/s/ * Denise Haley
(*as authorized by email on April 23, 2021)
DENISE HALEY
Attorney for Plaintiff

9
10
11
12 Dated: April 23, 2021

MCGREGOR W. SCOTT
United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

13
14
15
16 By /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant U.S. Attorney
Attorneys for Defendant
17
18
19
20
21
22
23
24
25
26
27
28

1 **ORDER**

2 Pursuant to the parties' above stipulation (Doc. 32), and for good cause shown,

3 IT IS ORDERED that Defendant shall have an extension, up to and including May 21,
4 2021, to respond to the Motion for Attorney's Fees Pursuant to 42 U.S.C. § 406(b) (Doc. 29).
5 Counsel for Plaintiff may file an optional reply brief by no later than June 4, 2021.

6
7 IT IS SO ORDERED.

8 Dated: April 26, 2021

9 */s/ Sheila K. Oberto*
10 UNITED STATES MAGISTRATE JUDGE