1 2 3 4 5 6 7	MCGREGOR W. SCOTT 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 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	DANIEL W. KISER,	Case No.: 1:18-cv-00518-JDP
14	Plaintiff,	JOINT STIPULATION FOR EXTENSION
15	VS.	OF TIME AND ORDER
16	NANCY A. BERRYHILL,Acting Commissioner of Social Security,)
17		
18	Defendant.)
19		
20	IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record	
21	that the time for responding to Plaintiff's Opening Brief be extended from March 22, 2019 to	
22	April 22, 2019. This is Defendant's first request for extension. Good cause exists to grant	
23	Defendant's request for extension. Counsel has been on intermittent sick leave with the	
24	flu/pneumonia for the past couple weeks. In addition, Counsel also has over 80+ active social	
25	security matters, which require two or more dispositive motions per week until mid-April. Due	
26	to heavy caseload and unexpected leave, Counsel needs additional time to adequately review the	
27	transcript and properly respond to Plaintiff's Op	bening Brief. The parties further stipulate that the
28		

JS for Extension of Time,

Case No. 1:18-cv-00518-JDP

1	Court's Scheduling Order shall be modified accordingly. Defendant makes this request in good	
2	faith with no intention to unduly delay the proceedings.	
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4	Respectfully submitted,	
5		
6	Dated: March 21, 2019	<u>/s/* Langley Kreuze</u> (*as authorized by email by C. Hodges on March 21, 2019)
7		LANGLEY KREUZE Attorney for Plaintiff
8		
9	Dated: March 21, 2019	MCGREGOR W. SCOTT
10	Dated. March 21, 2019	United States Attorney
11		DEBORAH LEE STACHEL Regional Chief Counsel, Region IX
12		Social Security Administration
13		By <u>/s/ Tina L. Naicker</u>
14 15		TINA L. NAICKER Special Assistant U.S. Attorney
15		Attorneys for Defendant
17		<u>ORDER</u>
18		
19	IT IS SO ORDERED.	
20		A A A
21	Dated: <u>March 25, 2019</u>	LINUTED STATES TACISTO ATE HIDGE
22		UNITED STATES MAGISTRATE JUDGE
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24		
25		
26		
27		
28	JS for Extension of Time,	Case No. 1:18-cv-00518-JDP
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