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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,)
15 vs.) **JOINT STIPULATION FOR EXTENSION**
16 NANCY A. BERRYHILL,) **OF TIME AND ORDER**
Acting Commissioner of Social Security,)
17 Defendant.)
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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 April 22, 2019 to **May**
22 **22, 2019**. This is Defendant's second request for extension. Good cause exists to grant
23 Defendant's request for extension. Counsel for Defendant (Counsel) recently had multiple family
24 deaths and has been out of the office caring for her elderly mother. In addition, last month,
25 Counsel was terribly ill with the flu and pneumonia and was out of the office for two and half
26 weeks on intermittent sick leave. Counsel also was out for her chronic migraines, which impair
27 her vision. In addition, Counsel has over 100+ active matters, which require two or more
28 dispositive motions per week until mid-June. Counsel fell behind on her heavy caseload as a
JS for Extension of Time, Case No. 1:18-cv-00518-JDP

1 result of her unanticipated sick leave. Due to unexpected leave and heavy workload, Counsel
2 respectfully requests additional time to adequately review the transcript and respond to the issues
3 raised in Plaintiff's Opening Brief. Defendant makes this request in good faith with no intention
4 to unduly delay the proceedings. Defendant apologizes for the belated request for extension, but
5 made this request as soon as reasonably practicable. The parties further stipulate that the Court's
6 Scheduling Order shall be modified accordingly.

7 Respectfully submitted,

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9 Dated: April 22, 2019

/s/ * Shellie Lott

(*as authorized by email on April 22, 2019)

SHELLIE LOTT
Attorney for Plaintiff

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13 Dated: April 22, 2019

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

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17 By /s/ Tina L. Naicker

TINA L. NAICKER
Special Assistant U.S. Attorney
Attorneys for Defendant

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20 **ORDER**

21 The court grants the requested extension and the Scheduling Order will be adjusted
22 accordingly.

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24 IT IS SO ORDERED.

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26 Dated: April 29, 2019


UNITED STATES MAGISTRATE JUDGE

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