1 2 3 4 5 6	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		
7 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	Defendant.		
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 April 22, 2019 to		
22	June 8, 2019. This is Defendant's third request for extension. Good cause exists to grant		
23	Defendant's request for extension. As the Court is aware, Counsel for Defendant (Counsel) had		
24	multiple family tragedies last month, including the death of her two cousins, and uncle. Counsel		
25	has also been taking care of her elderly mother, who had surgery yesterday. Counsel was also		
26	out of the office last week following another unexpected death of a close family friend, whose		
27	funeral was on Friday, May 17, 2019 with prayer services over the weekend. Counsel also		
28	continues to have ongoing health issues with he JS for Extension of Time, Cas	er chronic migraines and ulcers and has been on se No. 1:18-cv-00518-JDP	

intermittent sick leave. In addition, Counsel has over 100+ active matters, which require two or			
more dispositive motions per week until mid-July. Due to unexpected leave, Counsel fell behind			
on her heavy caseload. As such, Counsel respectfully requests additional time to adequately			
review the transcript and respond to the issues raised in Plaintiff's Opening Brief. Defendant			
makes this request in good faith with no intention to unduly delay the proceedings. Defendant			
apologizes for the belated request for extension, but made this request as soon as reasonably			
practicable. The parties further stipulate that the Court's Scheduling Order shall be modified			
accordingly.			
Respectfully submitted,			
Dated: May 22, 2019	/s/* Shellie Lott (*as authorized by email on May 22, 2019) SHELLIE LOTT Attorney for Plaintiff		
Dated: May 22, 2019	MCGREGOR W. SCOTT United States Attorney DEBORAH LEE STACHEL Regional Chief Counsel, Region IX Social Security Administration		
	By /s/ Tina L. Naicker TINA L. NAICKER Special Assistant U.S. Attorney Attorneys for Defendant		
<u>ORDER</u>			
Approved.			
IT IS SO ORDERED.			
Dated: May 25, 2019	UNITED STATES MAGISTRATE JUDGE		

JS for Extension of Time,

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

JS for Extension of Time,

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