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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.) **AMENDED JOINT STIPULATION FOR**
16 NANCY A. BERRYHILL,) **EXTENSION OF TIME AND ORDER**
Acting Commissioner of Social Security,) **FOR EXTENSION OF TIME FOR**
17 Defendant.) **DEFENDANT TO RESPOND TO**
18) **PLAINTIFF'S OPENING BRIEF.**

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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 June 7, 2019 to **June**
22 **11, 2019**. This is Defendant's fourth 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, and a
25 family friend. Counsel has also been taking care of her elderly mother, who had surgery in late
26 May and another follow up surgery this week, including taking her to a follow-up appointment
27 on the date of the current filing deadline. In addition, Counsel has over 100+ active matters,
28 which require two or more dispositive motions per week until mid-July. As such, Counsel
JS for Extension of Time, Case No. 1:18-cv-00518-JDP

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

6 Respectfully submitted,

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8 Dated: June 7, 2019

/s/ * Shellie Lott

(*as authorized by email on June 7, 2019)

SHELLIE LOTT

Attorney for Plaintiff

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12 Dated: June 7, 2019

MCGREGOR W. SCOTT

United States Attorney

DEBORAH LEE STACHEL

Regional Chief Counsel, Region IX

Social Security Administration

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16 By /s/ Tina L. Naicker

TINA L. NAICKER

Special Assistant U.S. Attorney

Attorneys for Defendant

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19 **ORDER**

20 Approved.

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22 IT IS SO ORDERED.

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24 Dated: June 11, 2019


UNITED STATES MAGISTRATE JUDGE