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10 Attorneys for Defendant

11 **UNITED STATES DISTRICT COURT**
 12 **EASTERN DISTRICT OF CALIFORNIA**
 13 **FRESNO DIVISION**

14)	Case No. 1:18-cv-00864-BAM
15	STEVE HERGHELIAN,)	
16	Plaintiff,)	JOINT STIPULATION AND ORDER FOR
17	vs.)	AN EXTENSION OF TIME
18	NANCY A. BERRYHILL,)	
19	Acting Commissioner of Social Security,)	
20	Defendant.)	

21
 22 IT IS HEREBY STIPULATED, by and between the parties, through their respective
 23 counsel of record, that Defendant’s time for responding to Plaintiff’s Opening Brief be extended
 24 from March 6, 2019 to April 19, 2019. This is Defendant’s first request for an extension of time
 25 to respond to Plaintiff’s Opening Brief.

26 Defendant requests this extension due to her counsel’s heavy workload. Defendant’s
 27 counsel is currently responsible for three Social Security appellate cases before the United States
 28 Court of Appeals for the Ninth Circuit, in addition to ten cases that require imminent briefing in

1 the United States District Courts for the Eastern District, Northern District, and Southern District
2 of California, and District of Arizona.

3 Defendant's counsel respectfully requests this additional time to expend the necessary
4 time to review the 834-page record and to evaluate the issues Plaintiff raised, and to submit
5 Defendant's response for review by this Court.

6 The parties further stipulate that all subsequent deadlines set forth in the Court's
7 Scheduling Order shall be extended accordingly.

8 The parties stipulate in good faith, with no intent to prolong proceedings unduly.

9 Respectfully submitted,

10 Dated: March 6, 2019

/s/ Beatrice Na for Jeffrey Duarte*
11 (* As authorized by Teresa Gowans via email on
12 March 6, 2019)
JEFFREY DUARTE

13 Attorney for Plaintiff

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15 Dated: March 5, 2019

MCGREGOR W. SCOTT
16 United States Attorney

17 By: /s/ Beatrice Na
18 BEATRICE NA
19 Special Assistant United States Attorney
20 Attorneys for Defendant

ORDER

21 Pursuant to the parties' stipulation, and cause appearing, Defendant's time for responding
22 to Plaintiff's Opening Brief is HEREBY EXTENDED to April 19, 2019. All other deadlines in
23 the Court's Scheduling Order are extended accordingly. The parties are advised that no further
24 extensions of time will be granted absent a demonstrated showing of good cause.
25 IT IS SO ORDERED.

26 Dated: March 7, 2019

/s/ Barbara A. McAuliffe
27 UNITED STATES MAGISTRATE JUDGE
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