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

13 MOHAMMAD AHMAD MASOUD,) Case No.: 1:19-cv-00127-EPG
14 Plaintiff,)
15 v.) **STIPULATION AND ORDER TO**
16) **EXTEND BRIEFING SCHEDULE**
17 ANDREW SAUL,)
Commissioner of Social Security,)
18 Defendant.)
19)

20 IT IS HEREBY STIPULATED by the parties, through their undersigned attorneys, to
21 extend Defendant's time to file his response to Plaintiff's opening brief with the Court by 30
22 days to **November 12, 2019**, and that all other scheduling dates set forth in the Court's Case
23 Management Order shall be extended accordingly. This is Defendant's first request for an
24 extension of time in this matter and he requests it in good faith and without any intent to prolong
25 proceedings unduly.

26 There is good cause for this extension request because counsel for Defendant is
27 responsible for performing a range of tasks that preclude drafting the Commissioner's response
28 to Plaintiff's opening brief by October 10, 2019, such as: drafting an answering brief in a Social

1 Security case pending before the Ninth Circuit; drafting briefs in Social Security cases before the
2 district courts within the Ninth Circuit; negotiating (or litigating) attorney fee matters pursuant to
3 the Equal Access to Justice Act before the district courts within the Ninth Circuit; defending the
4 Social Security Administration (agency) in personnel litigation pending before the Merit Systems
5 Protection Board; assisting with the training of a newly hired attorney in the agency's Office of
6 the General Counsel, Region IX; and handling an arbitration involving the agency and one of the
7 agency's collective bargaining units.

8 Counsel for Defendant apologizes to Plaintiff and the Court for any inconvenience caused
9 by this delay.

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11 Respectfully submitted,

12
13 Date: October 8, 2019

LAW OFFICES OF STUART T. BARASCH

14 By: /s/ Asim H. Modi for Stuart T. Barasch*

15 STUART T. BARASCH

**Authorized by email on October 8, 2019*

16 Attorney for Plaintiff

17 Date: October 8, 2019

McGREGOR W. SCOTT

18 United States Attorney

DEBORAH LEE STACHEL

19 Regional Chief Counsel, Region IX

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21 By: /s/ Asim H. Modi

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