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8 Attorneys for Defendant

9 **UNITED STATES DISTRICT COURT**
10 **EASTERN DISTRICT OF CALIFORNIA**
11 **SACRAMENTO DIVISION**

12
13 SHIRLEY MARTINEZ,) Case No.: 2:15-cv-02651-DMC
14 Plaintiff,)
15 vs.) **JOINT STIPULATION AND ORDER TO**
16 NANCY A. BERRYHILL,) **MODIFY SUPPLEMENTAL BRIEFING**
Acting Commissioner of Social Security,) **DEADLINE FOR RESPONSE TO**
17) **PLAINTIFF'S MOTION FOR**
18 Defendant.) **ATTORNEYS FEES PURSUANT TO**
) **EQUAL ACCESS TO JUSTICE ACT**
) **(DKT 34).**

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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 Motion for Attorneys Fees Pursuant to Equal Access to
22 Justice Act (EAJA) be extended for thirty additional days from April 4, 2019 to **May 6, 2019**,
23 with Plaintiff's reply due, on or before **May 20, 2019**. This is the parties' first request for
24 extension to modify the briefing schedule for Plaintiff's EAJA Motion. Good cause exists to
25 grant the request for extension. The parties are actively negotiating EAJA fees and hopefully
26 will resolve the issue without the need for further or additional motion practice. Counsel for
27 Defendant was out of the office on sick leave and personal leave during the time Plaintiff's
28 Counsel contacted her and was unable to get a response in time prior to filing of Plaintiff's EAJA

1 Motion. The parties make this request in good faith with no intention to unduly delay the
2 proceedings. As such, the new deadline for Defendant's response to Plaintiff's EAJA Motion
3 shall be on or before May 6, 2019, and Plaintiff's reply, if any, shall be on or before May 20,
4 2019.

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6 Respectfully submitted,

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8 Dated: March 26, 2019

/s/ *John Johnson
(*as authorized by email on March 20, 2018)
JOHN JOHNSON
Attorney for Plaintiff

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11 Dated: March 26, 2019

MCGREGOR W. SCOTT
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DEBORAH LEE STACHEL
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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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20 **ORDER**

21 APPROVED AND SO ORDERED:

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23 Dated: March 28, 2019


DENNIS M. COTA
UNITED STATES MAGISTRATE JUDGE