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8 Attorneys for Defendant

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

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

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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 May 6, 2019 to **June 6, 2019**,
23 with Plaintiff's reply due, on or before **June 20, 2019**. This is Defendant's second request for
24 extension to modify the briefing schedule for Plaintiff's EAJA Motion. Good cause exists to
25 grant the request for extension. Counsel for Defendant has had multiple family deaths in the
26 recent weeks and was out on leave. Counsel for Defendant also has been out on intermittent sick
27 leave due to her ongoing health issues. In addition, Counsel for Defendant is expected to be out
28 the first week of May to take care of her elderly mother following her surgery. Defendant makes

1 this request in good faith and is still attempting to resolve the matter without further motion
2 practice. As such, the proposed new deadline for Defendant's response to Plaintiff's EAJA
3 Motion shall be on or before **June 6, 2019**, and Plaintiff's reply, if any, shall be on or before
4 **June 20, 2019**.

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6 Respectfully submitted,

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8 Dated: May 1, 2019

/s/ *John Johnson
(*as authorized by email on April 30, 2019)
JOHN JOHNSON
Attorney for Plaintiff

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11 Dated: May 1, 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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20 **ORDER**

21 APPROVED AND SO ORDERED NUNC PRO TUNC TO MAY 6, 2019:

22
23 Dated: May 15, 2019


DENNIS M. COTA
UNITED STATES MAGISTRATE JUDGE