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

13 RUBINA ZAFAR ALAM,) Case No.: 2:17-cv-0701-JAM-CMK
)
 14 Plaintiff,) **STIPULATION AND ORDER TO**
) **EXTEND BRIEFING SCHEDULE**
 15 v.)
)
 16 NANCY A. BERRYHILL,)
 17 Acting 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 her summary judgment motion with the Court by 14 days to
 22 **January 24, 2018**, and that all other scheduling dates set forth in the Court’s Case Management
 23 Order shall be extended accordingly. This is Defendant’s first request for an extension of time in
 24 this matter and she requests it in good faith and without any intent to prolong proceedings
 25 unduly.

26 There is good cause for this extension request because counsel for Defendant has
 27 workload issues that preclude filing the summary judgment motion by January 10, 2018. In
 28 particular, counsel for Defendant is currently responsible for performing an extensive range of

1 tasks, including: reviewing the excerpts of record and drafting the Commissioner's answering
2 brief in a Social Security case before the Ninth Circuit; preparing for an oral argument before the
3 Ninth Circuit in a Social Security case; drafting briefs and summary judgment motions and
4 negotiating (or litigating) attorney fee matters pursuant to the Equal Access to Justice Act before
5 the district courts within the Ninth Circuit; conducting discovery in personnel-related litigation
6 pending before the Equal Employment Opportunity Commission; preparing for an arbitration
7 proceeding involving the agency and one of the agency's collective bargaining units; and
8 assisting with implementing the terms of the class action settlement reached in *Hart v. Berryhill*
9 (N.D.Cal. No. 3:15-cv-623-JST). Furthermore, due to recent holiday and work-related absences
10 from the office, counsel for Defendant requires this short-term extension to fully evaluate the
11 factual and legal issues presented in Plaintiff's summary judgment motion.

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

14 Respectfully submitted,

15
16 Date: January 9, 2018

CERNEY KREUZE & LOTT, LLP

17 By: /s/ Asim H. Modi for Langley Kreuze*

LANGLEY KREUZE

*Authorized by email on January 9, 2018

Attorney for Plaintiff

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19
20 Date: January 9, 2018

MCGREGOR W. SCOTT

United States Attorney

DEBORAH LEE STACHEL

Regional Chief Counsel, Region IX

Social Security Administration

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23
24 By: /s/ Asim H. Modi

ASIM H. MODI

Special Assistant United States Attorney

Attorneys for Defendant

ORDER

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APPROVED AND SO ORDERED

Dated: January 16, 2018


CRAIG M. KELLISON
UNITED STATES MAGISTRATE JUDGE