

1 MCGREGOR W. SCOTT
 United States Attorney
 2 DEBORAH LEE STACHEL, CSBN 230138
 Regional Chief Counsel, Region IX
 3 Social Security Administration
 ASIM H. MODI, NYSBN 4692018
 4 Special Assistant United States Attorney
 5 160 Spear Street, Suite 800
 San Francisco, CA 94105
 6 Telephone: 415-977-8952
 7 Facsimile: 415-744-0134
 Email: asim.modi@ssa.gov
 8 Attorneys for Defendant

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

13 KHATARI COLEMAN,) Case No.: 2:17-cv-1069-EFB
)
 14 Plaintiff,) **STIPULATION AND [PROPOSED]**
) **ORDER TO EXTEND BRIEFING**
 15 v.) **SCHEDULE**
)
 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 30 days to
 22 **March 23, 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 February 21, 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; drafting briefs and summary judgment
3 motions and negotiating (or litigating) attorney fee matters pursuant to the Equal Access to
4 Justice Act before the district courts within the Ninth Circuit; preparing for a hearing in
5 personnel-related litigation pending before the Equal Employment Opportunity Commission
6 (EEOC); completing discovery in personnel-related litigation pending before the EEOC;
7 preparing for an arbitration proceeding involving the agency and one of the agency's collective
8 bargaining units; and assisting with implementing the terms of the class action settlement
9 reached in *Hart v. Berryhill* (N.D. Cal. No. 3:15-cv-623-JST).

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

12 Respectfully submitted,

13
14 Date: February 13, 2018

BAY AREA LEGAL AID

15 By: /s/ Asim H. Modi for Donald Medearis*
16 DONALD MEDEARIS
17 *Authorized by email on February 13, 2018
Attorney for Plaintiff

18 Date: February 13, 2018

MCGREGOR W. SCOTT
United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

19
20
21
22 By: /s/ Asim H. Modi
23 ASIM H. MODI
24 Special Assistant United States Attorney
25 Attorneys for Defendant

ORDER

26 APPROVED AND SO ORDERED.

27 DATED: February 13, 2018.

28 
EDMUND F. BRENNAN
UNITED STATES MAGISTRATE JUDGE