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8 Attorneys for Defendant

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

13 ERIC GONZALES MIRANDA,  
 14 Plaintiff,  
 15 vs.  
 16 NANCY A. BERRYHILL,  
 Acting Commissioner of Social Security,  
 17 Defendant.  
 18

) Case No.: 2:17-cv-01653-CMK

) **JOINT STIPULATION AND ORDER FOR**  
 ) **EXTENSION OF TIME FOR**  
 ) **DEFENDANT TO RESPOND TO**  
 ) **PLAINTIFF’S MOTION FOR SUMMARY**  
 ) **JUDGMENT**

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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 Summary Judgment be extended from June  
 22 14, 2018 to **July 16, 2018**. This is Defendant’s first request for extension. Good cause exists to  
 23 grant Defendant’s request for extension. Counsel respectfully requests additional time to  
 24 respond to Plaintiff’s Motion for Summary Judgment due to shortened staff, unexpected leave  
 25 and heavy workload. Counsel has over 75+ pending social security cases, which require two or  
 26 more dispositive motions a week until July. Defendant makes this request in good faith with no  
 27 intention to unduly delay the proceedings.

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1 The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

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3 Respectfully submitted,

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5 Dated: June 13, 2018

s/ \*Jacqueline Forslund  
(\*as authorized by email on June 9, 2018)  
JACQUELINE FORSLUND  
Attorney for Plaintiff

6  
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8  
9 Dated: June 13, 2018

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13 By /s/ Tina L. Naicker  
14 TINA L. NAICKER  
15 Special Assistant U.S. Attorney  
16 Attorneys for Defendant

17 **ORDER**

18 APPROVED AND SO ORDERED:

19  
20 Dated: June 15, 2018

  
CRAIG M. KELLISON  
UNITED STATES MAGISTRATE JUDGE