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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**

19  
 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 July  
 22 13, 2018 to **August 13, 2018**. This is Defendant’s second request for extension. Good cause  
 23 exists to grant Defendant’s request for extension. Counsel had a death of a family member and is  
 24 attending prayer services in the next few weeks. In addition, Counsel has over 85+ pending  
 25 social security cases, which require two or more dispositive motions a week until mid-August.  
 26 Due to current workload demands and upcoming leave, Counsel needs additional time to  
 27 adequately review the transcript and properly respond to Plaintiff’s Motion for Summary  
 28 Judgment. Defendant makes this request in good faith with no intention to unduly delay the

1 proceedings. Counsel apologizes for the belated request, but did not anticipate being out on the  
2 current filing deadline due to the unexpected death of a family member. The parties further  
3 stipulate that the Court's Scheduling Order shall be modified accordingly.  
4

5 Respectfully submitted,

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7 Dated: July 5, 2018

s/ \*Jacqueline Forslund  
(\*as authorized by email on July 3, 2018)  
JACQUELINE FORSLUND  
Attorney for Plaintiff

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10  
11 Dated: July 5, 2018

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United States Attorney  
DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX  
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15 By /s/ Tina L. Naicker  
16 TINA L. NAICKER  
17 Special Assistant U.S. Attorney  
18 Attorneys for Defendant

19 **ORDER**

20 APPROVED AND SO ORDERED:

21  
22 Dated: July 11, 2018

  
CRAIG M. KELLISON  
UNITED STATES MAGISTRATE JUDGE