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8 Attorneys for Defendant

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

13 MEJONAH POLLARD,
14 Plaintiff,
15 vs.
16 NANCY A. BERRYHILL,
Deputy Commissioner for Operations,
17 performing the duties and functions not
reserved to the Commissioner of Social
18 Security,
19 Defendant.

) Case No.: 2:17-cv-01788-KJN
)
) **JOINT STIPULATION AND ORDER FOR**
) **EXTENSION OF TIME FOR**
) **DEFENDANT TO RESPOND TO**
) **PLAINTIFF'S MOTION FOR SUMMARY**
) **JUDGMENT**
)
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22 **IT IS HEREBY STIPULATED**, by the parties, through their respective counsel of record,
23 that the time for responding to Plaintiff's Motion for Summary Judgment be extended from April
24 26, 2018 to **June 1, 2018**. This is Defendant's first request for extension. Good cause exists to
25 grant Defendant's request for extension. Counsel has been on intermittent medical leave due to
26 her chronic migraines, which impair her vision. Counsel has over 75+ pending social security
27 cases, which require two or more dispositive motions a week until late June. Counsel also has
28 two pending Ninth Circuit matters that require additional levels of review and two pending civil

1 rights matters which require imminent attention and investigation. Due to current workload
2 demands and unanticipated leave, Counsel became behind on her heavy caseload and needs
3 additional time to adequately review the transcript and properly respond to Plaintiff's Motion for
4 Summary Judgment. Defendant makes this request in good faith with no intention to unduly
5 delay the proceedings. The parties further stipulate that the Court's Scheduling Order shall be
6 modified accordingly.

7 Respectfully submitted,

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9 Dated: April 13, 2018

s/ *Jesse Kaplan
(*as authorized by email on April 13, 2018)
JESSE KAPLAN
Attorney for Plaintiff

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13 Dated: April 13, 2018

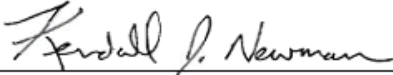
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17 By /s/ Tina L. Naicker
18 TINA L. NAICKER
19 Special Assistant U.S. Attorney
20 Attorneys for Defendant

21 **ORDER**

22 APPROVED AND SO ORDERED:

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24 Dated: April 16, 2018

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26 KENDALL J. NEWMAN
27 UNITED STATES MAGISTRATE JUDGE
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