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8 Attorneys for Defendant

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

12  
13 VICTORIA MORALES, ) Case No. 2:17-cv-02246-CKD  
14 )  
Plaintiff, )  
15 ) STIPULATION & [~~PROPOSED~~] ORDER  
vs. ) FOR EXTENSION OF TIME  
16 ) (SECOND REQUEST)  
NANCY A. BERRYHILL, )  
17 Acting Commissioner of Social Security, )  
18 )  
Defendant. )  
19

20  
21 IT IS HEREBY STIPULATED, by and between the parties through their respective  
22 counsel of record, with the Court's approval, that Defendant shall have an 8-day extension of  
23 time, from June 28, 2018 to July 6, 2018, to respond to Plaintiff's Motion for Summary  
24 Judgment. All other dates in the Court's Scheduling Order shall be extended accordingly.

25 This is Defendant's second request for an extension of time. Defendant respectfully  
26 submits that good cause exists for a second short extension because Defendant's counsel was out  
27 of the office unexpectedly and requires additional time to complete her review of the record and  
28 analysis of the issues raised in Plaintiff's Motion for Summary Judgment and to prepare

1 Defendant's response. Defendant's counsel also has a number of other briefs due and is trying  
2 diligently to manage competing workload demands. Plaintiff does not oppose Defendant's  
3 request for an extension of time.

4  
5 Respectfully submitted,

6 Dated: June 27, 2018

CERNEY KREUZE & LOTT, LLP

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8 By: /s/ Shellie Lott\*  
9 SHELLIE LOTT  
10 Attorneys for Plaintiff  
11 [\*As authorized by e-mail on June 27, 2018]

12 Dated: June 28, 2018

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

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16 By: /s/ Margaret Branick-Abilla  
17 MARGARET BRANICK-ABILLA  
18 Special Assistant United States Attorney  
19 Attorneys for Defendant

20 **[PROPOSED] ORDER**

21 Pursuant to stipulation, IT IS SO ORDERED.

22  
23 Dated: June 28, 2018

24   
25 \_\_\_\_\_  
26 CAROLYN K. DELANEY  
27 UNITED STATES MAGISTRATE JUDGE  
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