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

12
13 JOSEF BAILEY,) Case No.: 2:17-cv-02360-JAM-DMC
14 Plaintiff,)
15 vs.) STIPULATION AND ORDER FOR AN
16 NANCY A. BERRYHILL,) EXTENSION OF TIME FOR
Acting Commissioner of Social Security,) DEFENDANT’S RESPONSE TO
17 Defendant.) PLAINTIFF’S MOTION FOR SUMMARY
18) JUDGMENT

19
20 IT IS HEREBY STIPULATED, by and between the parties, through their respective
21 counsel of record, that Defendant shall have an extension of time to respond to Plaintiff’s motion
22 for summary judgment, to the new due date of September 18, 2018.

23 There is good cause for this request. Since the Court’s granting of Defendant’s previous
24 request for a brief extension of time of 5 days, Defendant’s counsel has been addressing her full
25 workload of district court cases and other cases since returning from approved leave for multiple
26 weeks. In addition, new matters that were not previously anticipated, had arisen and have
27 created some crowding of the briefing schedule around the due date of this case. Thus,
28 Defendant is respectfully requesting additional time up to and including September 18, 2018, to

1 fully review the record and research the issues presented by Plaintiff's motion for summary
2 judgment in this case. This request is made in good faith with no intention to unduly delay the
3 proceedings.

4
5 Respectfully submitted,

6 Date: September 17, 2018

7 s/ Jesse S. Kaplan by C.Chen*
8 (As authorized by email on 9/17/2018)
9 JESSE S. KAPLAN
Attorneys for Plaintiff

10 Date: September 17, 2018

11 MCGREGOR W. SCOTT
12 United States Attorney

13 By s/ Carolyn B. Chen
14 CAROLYN B. CHEN
Special Assistant U. S. Attorney

15 Attorneys for Defendant

16
17 ORDER

18 APPROVED AND SO ORDERED. DEFENDANT'S CROSS-MOTION, FILED ON
19 SEPTEMBER 17, 2018, IS DEEMED TIMELY.

20 Dated: September 19, 2018

21 

22 DENNIS M. COTA
23 UNITED STATES MAGISTRATE JUDGE