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

12 CAROL LYNEE HAGAR,) Case No.: 2:17-cv-02381-DMC
13)
14 Plaintiff,) **STIPULATION FOR EXTENSION OF**
15 vs.) **TIME AND**
16) **ORDER**
NANCY A. BERRYHILL,)
17 Acting Commissioner of Social Security,)
18 Defendant.)
19)
20)

21 IT IS HEREBY STIPULATED, by and between Carol Lynee Hagar (Plaintiff) and Nancy
22 A. Berryhill, Acting Commissioner of Social Security (Defendant), by and through their respective
23 counsel of record, that, with the Court's approval, Defendant shall have an extension of time of
24 thirty (30) days to file her Opposition to Plaintiff's Opening Brief. The current due date is
25 November 27, 2018. The new date will be December 27, 2018. All other deadlines will extend
26 accordingly.

27 Defense counsel needs an extension of time because the attorney responsible needs more
28 time to draft the response, go through the necessary in-house reviews for new attorneys, and

1 manage her other cases. This request is made in good faith with no intention to delay unduly the
2 proceedings. Counsel apologizes to the Court for any inconvenience this delay may cause.

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4 This is Defendant's first request for an extension.

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6 Respectfully submitted,

7 Dated: November 27, 2018

8 PHILLIP A. TALBERT
9 United States Attorney
10 DEBORAH LEE STACHEL
11 Regional Chief Counsel, Region IX
12 Social Security Administration

13 By: /s/ S. Wyeth McAdam
14 S. WYETH MCADAM
15 Special Assistant United States Attorney
16 Attorneys for Defendant

17 /s/ Shanny J. Lee
18 SHANNY J. LEE
19 Attorney for Plaintiff
20 Law Offices of Harry J. Binder and Charles E. Binder, P.C.
21 (*As authorized via e-mail on November 26, 2018)

22
23 ORDER

24 GOOD CAUSE APPEARING, PURSUANT TO STIPULATION, DEFENDANT SHALL FILE
25 HER OPPOSITION TO PLAINTIFF'S OPENING BRIEF ON OR BEFORE DECEMBER 27,
26 2018.

27 Dated: November 27, 2018

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DENNIS M. COTA
UNITED STATES MAGISTRATE JUDGE