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

13 JAMES STEVENS,
14 Plaintiff,
15 vs.
16 NANCY A. BERRYHILL,
Acting Commissioner of Social Security,
17 Defendant.
18

) Case No.: 2:17-cv-02496-DMC

) **JOINT STIPULATION AND ORDER FOR**
) **EXTENSION OF TIME FOR**
) **DEFENDANT TO RESPOND TO**
) **PLAINTIFF'S MOTION FOR SUMMARY**
) **JUDGMENT**

19 IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record,
20 that the time for responding to Plaintiff's Motion for Summary Judgment be extended from
21 September 18, 2018 to **September 19, 2018**. This is Defendant's fourth request for extension.
22 Good cause exists to grant Defendant's request for extension. Counsel went to urgent care for a
23 medical emergency on the date of the current filing deadline and was not able to finish
24 Defendant's response. Defendant makes this request in good faith with no intention to unduly
25 delay the proceedings. Counsel apologizes for the belated request, but made the request as soon
26 as practicable.
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The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

Respectfully submitted,

Dated: September 18, 2018

/s/ *Josephine M. Gerrard
(*as authorized by email on September 18, 2018)
JOSEPHINE M. GERRARD
Attorney for Plaintiff

Dated: September 18, 2018

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

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

ORDER

APPROVED AND SO ORDERED. FURTHER REQUESTS FOR EXTENSIONS OF TIME TO FILE A PARTY'S BRIEF SUBMITTED ON THE EVE OF THE DEADLINE WILL BE DISFAVORED UNLESS THE BRIEF IS FILED WITH THE REQUEST.

Dated: September 19, 2018


DENNIS M. COTA
UNITED STATES MAGISTRATE JUDGE