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9 Attorneys for Defendant

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

13 MOHDMAHIR BIN ABDULLAH,) 2:17-cv-02522-DMC
14 Plaintiff,)
15 vs.) MOTION AND PROPOSED ORDER FOR
16 NANCY A. BERRYHILL,) AN EXTENSION OF TIME
17 Acting Commissioner of Social Security,)
18 Defendant.)
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20 Defendant hereby moves for a three-week extension of time from March 18, 2019 to
21 April 8, 2019 respond to Plaintiff's opening brief. Defendant's counsel unexpectedly had to
22 leave work last week for two days to travel out of state for a family member's funeral.
23 Defendant's counsel has to complete four briefs in other social security cases and represent the
24 agency in an oral argument within the next month. Defendant's counsel also has to assist the
25 U.S. Attorney's Office in responding to a complaint in a federal court employment case where
26 the answer is due in three weeks.

27 Defendant's counsel contacted Plaintiff via phone on March 14 and March 15, but has
28 not heard back from Plaintiff.

1 This request is made in good faith with no intention to unduly delay the proceedings.
2 Counsel apologizes to the Court for any inconvenience caused by this delay.

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4 Respectfully submitted,

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7 Dated: March 18, 2019

MCGREGOR W. SCOTT
United States Attorney
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11 By: /s/ Chantal R. Jenkins
12 CHANTAL R. JENKINS
13 Special Assistant United States Attorney
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16 ORDER

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18 APPROVED AND SO ORDERED NUNC PRO TUNC TO MARCH 18, 2019:
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20
21 Dated: March 20, 2019


22 DENNIS M. COTA
23 UNITED STATES MAGISTRATE JUDGE
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