

1 MCGREGOR W. SCOTT  
 2 United States Attorney  
 3 DEBORAH LEE STACHEL  
 4 Regional Chief Counsel, Region IX  
 5 Social Security Administration  
 6 TINA L. NAICKER, CSBN 252766  
 7 Special Assistant United States Attorney  
 8 160 Spear Street, Suite 800  
 9 San Francisco, California 94105  
 10 Telephone: (415) 268-5611  
 11 Facsimile: (415) 744-0134  
 12 E-Mail: Tina.Naicker@SSA.gov

13 Attorneys for Defendant

14 **UNITED STATES DISTRICT COURT**  
 15 **EASTERN DISTRICT OF CALIFORNIA**  
 16 **SACRAMENTO DIVISION**

17 VYACHESLAV RUMANTSEV,	)	Case No.: 2:17-cv-02539-EFB
18 Plaintiff,	)	
19 vs.	)	<b>JOINT STIPULATION AND</b>
20 NANCY A. BERRYHILL,	)	<b>[PROPOSED] ORDER FOR EXTENSION</b>
21 Acting Commissioner of Social Security	)	<b>OF TIME FOR DEFENDANT TO</b>
22 Defendant.	)	<b>RESPOND TO PLAINTIFF'S MOTION</b>
	)	<b>FOR SUMMARY JUDGMENT</b>
	)	
	)	
	)	

23 IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that  
 24 the time for responding to Plaintiff's Motion for Summary Judgment be extended from August  
 25 17, 2018 to **August 31, 2018**. This is Defendant's second request for extension. Good cause  
 26 exists to grant Defendant's request for extension. Counsel had another death in her family this  
 27 week and is out on the current filing deadline. Counsel for Defendant also anticipates taking  
 28 additional leave next week for funeral services. In addition, Counsel has over 85+ pending  
 social security cases, which require two or more dispositive motions a week until mid-  
 September. Due to current workload demands and upcoming leave, Counsel needs additional  
 time to adequately review the transcript and properly respond to Plaintiff's Motion for Summary

JS for Extension of Time; 2:17-cv-02539-EFB

1 Judgment. Defendant makes this request in good faith with no intention to unduly delay the  
2 proceedings. Counsel apologizes for the belated request, but did not anticipate being out on the  
3 current filing deadline due to the unexpected death of another family member. The parties  
4 further stipulate that the Court's Scheduling Order shall be modified accordingly.

5  
6 Respectfully submitted,

7  
8 Dated: August 17, 2018

/s/ \*Jesse Kaplan  
(\*as authorized by email on August 17, 2018)  
JESSE KAPLAN  
Attorney for Plaintiff

9  
10  
11  
12 Dated: August 17, 2018

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

13  
14  
15  
16 By /s/ Tina L. Naicker  
TINA L. NAICKER  
Special Assistant U.S. Attorney  
Attorneys for Defendant

17  
18  
19 **ORDER**

20 APPROVED AND SO ORDERED.

21  
22 DATED: August 20, 2018.

  
EDMUND F. BRENNAN  
UNITED STATES MAGISTRATE JUDGE