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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.)	JOINT STIPULATION AND
20 NANCY A. BERRYHILL,)	[PROPOSED] ORDER FOR EXTENSION
21 Acting Commissioner of Social Security)	OF TIME FOR DEFENDANT TO
22 Defendant.)	RESPOND TO PLAINTIFF'S MOTION
)	FOR SUMMARY JUDGMENT

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
 25 September 4, 2018 to **September 11, 2018**. This is Defendant's fourth request for extension.

26 Good cause exists to grant Defendant's request for extension. Counsel is sick and has a migraine
 27 on the date of the current filing deadline, which impairs her vision. Counsel attempted diligently
 28 to finish her response, but could not do so by the current filing deadline. Counsel is also
 expected to be out of the office on September 7th and 8th, 2018. As a result of Counsel's
 unexpected time off, Counsel did not have sufficient time to finalize Defendant's response. As
 such, Defendant needs additional time to adequately review the transcript and properly respond

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

1 to Plaintiff's Motion for Remand. Defendant makes this request in good faith with no intention
2 to unduly delay the proceedings. Counsel apologizes for the belated request, but did not
3 anticipate taking additional leave. The parties further stipulate that the Court's Scheduling Order
4 shall be modified accordingly.

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7 Respectfully submitted,

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9 Dated: September 4, 2018

/s/ *Jesse Kaplan
(*as authorized by email on September 4, 2018)
JESSE KAPLAN
Attorney for Plaintiff

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13 Dated: September 4, 2018

MCGREGOR W. SCOTT
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DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
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17 By /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant U.S. Attorney
Attorneys for Defendant

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20 **ORDER**

21 APPROVED AND SO ORDERED.

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23 DATED: September 5, 2018.


HON. EDMUND F. BRENNAN
UNITED STATES MAGISTRATE JUDGE