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8 Attorneys for Defendant

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

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

) Case No.: 2:17-cv-02541-EFB

) **JOINT STIPULATION AND**
) **[PROPOSED] ORDER FOR EXTENSION**
) **OF TIME TO RESPOND TO**
) **PLAINTIFF’S MOTION FOR SUMMARY**
) **JUDGMENT**

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 20 IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record,
 21 that the time for responding to Plaintiff’s Motion for Summary Judgment be extended from May
 22 24, 2018 to **June 25, 2018**. This is Defendant’s first request for extension. Good cause exists to
 23 grant Defendant’s request for extension. Counsel will be out on leave on the date of the current
 24 filing deadline. In addition, Counsel has over 75+ pending social security cases, which require
 25 two or more dispositive motions a week until early July. Counsel also has a pending Ninth
 26 Circuit matter that require additional levels of review and several civil rights matters which
 27 require imminent attention and investigation. Due to current workload demands and upcoming
 28 scheduled leave, Counsel needs additional time to adequately review the transcript and properly

JS for Extension of Time and PO; 2:17-cv-02541-EFB

1 respond to Plaintiff's Motion for Summary Judgment. Defendant makes this request in good
2 faith with no intention to unduly delay the proceedings. The parties further stipulate that the
3 Court's Scheduling Order shall be modified accordingly.

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5 Respectfully submitted,

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7 Dated: May 21, 2018

/s/ *Stuart T. Barasch
(*as authorized by email on May 18, 2018)
STUART T. BARASCH
Attorney for Plaintiff

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10
11 Dated: May 21, 2018

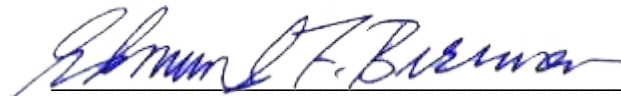
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15 By /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant U.S. Attorney
Attorneys for Defendant

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18 **ORDER**

19 APPROVED AND SO ORDERED.

20 DATED: May 30, 2018.


HON. EDMUND F. BRENNAN
UNITED STATES MAGISTRATE JUDGE