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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**

19
 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 June
 22 25, 2018 to **June 28, 2018**. This is Defendant’s second request for extension. Good cause
 23 exists to grant Defendant’s request for extension. Counsel attended a funeral on the date of the
 24 current filing deadline and is attending prayer services thereafter. In addition, Counsel has over
 25 75+ pending social security cases, which require two or more dispositive motions a week until
 26 early August. Due to current workload demands and upcoming leave, Counsel needs additional
 27 time to adequately review the transcript and properly respond to Plaintiff’s Motion for Summary
 28 Judgment. Defendant makes this request in good faith with no intention to unduly delay the

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

1 proceedings. Counsel apologizes for the belated request, but did not anticipate being out on the
2 current filing deadline due to the unexpected death of a family member. The parties further
3 stipulate that the Court's Scheduling Order shall be modified accordingly.
4

5 Respectfully submitted,

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7 Dated: June 25, 2018

/s/ *Stuart T. Barasch
(*as authorized by Ted Wicklund via email for
8 Stuart T. Barasch on June 25, 2018)
9 STUART T. BARASCH
Attorney for Plaintiff

10
11 Dated: June 25, 2018

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

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

18 **ORDER**

19 APPROVED AND SO ORDERED.

20
21 DATED: June 27, 2018.


22 HON. EDMUND F. BRENNAN
23 UNITED STATES MAGISTRATE JUDGE
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