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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 for one
 22 additional week from June 28, 2018 to **July 5, 2018**. This is Defendant’s third request for
 23 extension. Good cause exists to grant Defendant’s request for extension. Since the date of
 24 Counsel’s last request for attending her uncle’s funeral, Counsel has been experiencing chronic
 25 migraines, which impair her vision and was out on sick leave on the date of the current filing
 26 deadline. As such, Counsel needs additional time to properly respond to Plaintiff’s Motion for
 27 Summary Judgment. Defendant makes this request in good faith with no intention to unduly
 28 delay the proceedings. Counsel apologizes for the belated request, but did not anticipate needing

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

1 additional leave due to her medical issues. The parties further stipulate that the Court's
2 Scheduling Order shall be modified accordingly.

3
4 Dated: June 28, 2018

/s/ *Stuart T. Barasch
(*as authorized by email on June 28, 2018)
STUART T. BARASCH
Attorney for Plaintiff

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8 Dated: June 28, 2018

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DEBORAH LEE STACHEL
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12 By /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant U.S. Attorney
Attorneys for Defendant

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14
15 **ORDER**

16 APPROVED AND SO ORDERED.

17
18 DATED: July 2, 2018.


EDMUND F. BRENNAN
UNITED STATES MAGISTRATE JUDGE