

1 MCGREGOR W. SCOTT
United States Attorney
2 DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
3 Social Security Administration
SHARON LAHEY
4 Special Assistant United States Attorney
160 Spear Street, Suite 800
5 San Francisco, California 94105
Telephone: 415-977-8963
6 Facsimile: 415-744-0134
7 E-mail: Sharon.Lahey@ssa.gov

8 Attorneys for DEFENDANT

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10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA
12 FRESNO

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14 LORENA ANGELA JOHNSON,

15 Plaintiff,

16 vs.

17 NANCY A. BERRYHILL, Acting
Commissioner Of Social Security,

18 Defendant.
19

) CASE No. 2:18-cv-00005-DMC
)
)

) **STIPULATION TO EXTEND TIME FOR**
) **DEFENDANT TO RESPOND TO**
) **PLAINTIFF'S MOTION FOR SUMMARY**
) **JUDGMENT**

20 LORENA ANGELA JOHNSON (Plaintiff) and NANCY A. BERRYHILL, Acting
21 Commissioner Of Social Security (Defendant or the Commissioner), hereby stipulate, subject to
22 the approval of the Court, to a 14-day extension of time for Defendant to respond to Plaintiff's
23 Motion for Summary Judgment (Docket Number 27). This is the fourth request for an extension
24 of time sought in the above-captioned matter, and it is Defendant's first request for additional
25 time. The current deadline is November 19, 2018, and the new deadline would be December 3,
26 2018. Defendant requests this additional time because her undersigned counsel was
27 unexpectedly out of the office on medical leave during the week of November 5, 2018. As a
28 result, the undersigned defense counsel requires additional time to adequately address the issues

1 Plaintiff raises in her motion for summary judgment. The parties further stipulate that the
2 scheduling order in the above-captioned matter be modified accordingly.

3 Respectfully submitted,

4 CERNEY KREUZE & LOTT, LLP

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6 Dated: November 15, 2018

By: /s/ Shellie Lott*

SHELLIE LOTT

Attorney for Plaintiff

[*As authorized by e-mail on November 15, 2018

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9 Dated: November 15, 2018

MCGREGOR W. SCOTT

United States Attorney

DEBORAH LEE STACHEL

Regional Chief Counsel, Region IX

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13 By: /s/ Sharon Lahey

SHARON LAHEY

Assistant Regional Counsel

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17 **ORDER**

18 Pursuant to the parties' stipulation, IT IS SO ORDERED. Defendant shall respond to
19 Plaintiff's motion for summary judgment on or before December 3, 2018. Plaintiff shall file any
20 reply on or before December 17, 2018. All other deadlines are modified accordingly.

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23
24 Dated: November 19, 2018



DENNIS M. COTA

UNITED STATES MAGISTRATE JUDGE