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

13 CATHERINE HALL-KANELIS,) Case No.: 2:18-cv-00301-AC
)
 14 Plaintiff,) **STIPULATION AND [PROPOSED]**
) **ORDER TO EXTEND BRIEFING**
 15 v.) **SCHEDULE**
)
 16 NANCY A. BERRYHILL,)
 17 Acting Commissioner of Social Security,)
)
 18 Defendant.)
 19)

20 IT IS HEREBY STIPULATED by the parties, through their undersigned attorneys, to
 21 extend Defendant’s time to file her summary judgment motion with the Court by 30 days to
 22 **September 26, 2018**, and that all other scheduling dates set forth in the Court’s Case
 23 Management Order shall be extended accordingly. This is Defendant’s first request for an
 24 extension of time in this matter and she requests it in good faith and without any intent to
 25 prolong proceedings unduly.

26 There is good cause for this extension request because counsel for Defendant has
 27 workload issues that preclude filing her cross-motion by August 27, 2018. In particular, counsel
 28 for Defendant is currently responsible for performing an extensive range of tasks, such as:

1 drafting briefs and summary judgment motions (including five due in the next three weeks) in
2 Social Security cases before the district courts within the Ninth Circuit, negotiating (or litigating)
3 attorney fee matters pursuant to the Equal Access to Justice Act before the district courts within
4 the Ninth Circuit; drafting a post-hearing brief for an arbitration proceeding involving the agency
5 and one of the agency's collective bargaining units; assisting with implementing the terms of the
6 class action settlement reached in *Hart v. Berryhill* (N.D.Cal. No. 3:15-cv-623-JST); and
7 preparing training materials and conducting presentations for the agency's Office of Hearing
8 Operations. Counsel for Defendant has also been out of the office for significant portions of the
9 last three weeks for these presentations to the agency's hearing offices.

10 Counsel for Defendant apologizes to Plaintiff and the Court for any inconvenience caused
11 by this delay.

12 Respectfully submitted,

13
14 Date: August 21, 2018

CERNEY KREUZE & LOTT, LLP

15 By: /s/ Asim H. Modi for Shellie Lott*
16 SHELLIE LOTT
17 *Authorized by email on August 21, 2018
Attorney for Plaintiff

18 Date: August 21, 2018

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22 By: /s/ Asim H. Modi
23 ASIM H. MODI
24 Special Assistant United States Attorney
Attorneys for Defendant

25 ORDER

26 APPROVED AND SO ORDERED

27 DATED: August 21, 2018

28 
ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE