McGREGOR W. SCOTT 1 United States Attorney DEBORAH LEE STACHEL 2 Regional Chief Counsel, Region IX 3 Social Security Administration SHEA LITA BOND, SBN D.C. 469103 4 Special Assistant United States Attorney 160 Spear Street, Suite 800 5 San Francisco, California 94105 6 Telephone: (415) 977-8934 Facsimile: (415) 744-0134 7 E-Mail: Shea.Bond@ssa.gov 8 Attorneys for Defendant 9 UNITED STATES DISTRICT COURT 10 EASTERN DISTRICT OF CALIFORNIA 11 SACRAMENTO DIVISION 12 13 Case No. 2:18-cv-00484-EFB RITA SHANAHAN, 14 STIPULATION AND PROPOSED ORDER Plaintiff, FOR AN EXTENSION OF TIME 15 16 NANCY A. BERRYHILL, Acting Commissioner of Social Security, 17 18 Defendant. 19 20 IT IS HEREBY STIPULATED, by and between the parties, through their respective 21 counsel of record, that Defendant's time for responding to Plaintiff's Motion for Summary 22 Judgment be extended by 31 days, from September 21, 2018 to October 22, 2018. The parties 23 further stipulate that the Court's Scheduling Order shall be extended accordingly. 24 This is Defendant's first request for an extension of time to respond to Plaintiff's motion. 25 Defendant respectfully submits that good cause exists for the requested extension because 26 Defendant's counsel requires additional time to review the record, to evaluate the issues raised in 27 Plaintiff's brief, and to prepare Defendant's response. This request is made in good faith and 28

1	with no intention to unduly delay the proceedings, and counsel apologizes for any	
2	inconvenience. Plaintiff does not oppose Defendant's request for an extension of time.	
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4		Dagnactfully submitted
5		Respectfully submitted,
6	Dated: September 20, 2018	/s/ Lawrence D. Rohlfing*  (*as authorized via email on September 20, 2018)
7		LAWRENCE D. ROHLFING
8		Attorney for Plaintiff
9	Dated: September 20, 2018	McGREGOR W. SCOTT
10		United States Attorney DEBORAH LEE STACHEL
11		Regional Chief Counsel, Region IX
12		Social Security Administration
13	By:	/s/ Shea Lita Bond SHEA LITA BOND
14		Special Assistant U.S. Attorney
15	on governo	Attorneys for Defendant
16	Attorneys for Defendant OF COUNSEL: Allison J. Cheung Assistant Regional Counsel, Region IX	
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18		
19		<u>ORDER</u>
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21	APPROVED AND SO ORDERED.	00 100
22	Dated: September 24, 2018.	Smun F. Biswa
23	Dated. September 24, 2016.	THE HONORABLE EDMUND F. BRENNAN
24		United States Magistrate Judge
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