

1 MCGREGOR W. SCOTT
United States Attorney
2 DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
3 Social Security Administration
4 MARGARET BRANICK-ABILLA, CSBN 223600
Special Assistant United States Attorney
5 160 Spear Street, Suite 800
San Francisco, California 94105
6 Telephone: (415) 977-8929
7 Facsimile: (415) 744-0134
E-Mail: Margaret.Branick-Abilla@ssa.gov
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9 Attorneys for Defendant

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

13 JORDAN MARK SAMFORD HASTIE,)	Case No. 2:18-cv-00898-CKD
)	
14 Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER FOR EXTENSIONN OF TIME
15 vs.)	
)	
16 NANCY A. BERRYHILL,)	
17 Acting Commissioner of Social Security,)	
)	
18 Defendant.)	

20 IT IS HEREBY STIPULATED, by and between the parties through their respective
21 counsel of record, with the approval of the Court, that Defendant shall have a 35-day extension
22 of time, from November 28, 2018 to January 2, 2019, to respond to Plaintiff's Motion for
23 Summary Judgment. All other dates in the Court's Scheduling Order shall be extended
24 accordingly.

25 This is Defendant's first request for an extension of time. Defendant respectfully submits
26 that good cause exists for the requested extension because the undersigned counsel for Defendant
27 has been out on leave and needs additional time to complete her review of the sizable
28 administrative record, to evaluate the issues raised in Plaintiff's Motion, to determine whether

1 options exist for settlement, and to accommodate competing workload demands. Plaintiff does
2 not oppose Defendant's request for an extension of time.

3
4 Respectfully submitted,

5 Dated: November 23, 2018

OSTERHOUT BERGER DISABILITY LAW LLC

6
7 By: /s/ Lindsay F. Osterhout*

Lindsay F. Osterhout

8 Attorneys for Plaintiff

9 [*As authorized by e-mail on Nov. 23, 2018]

10 Dated: November 26, 2018

MCGREGOR W. SCOTT

11 United States Attorney

DEBORAH LEE STACHEL

12 Regional Chief Counsel, Region IX

13 Social Security Administration

14
15 By: /s/ Margaret Branick-Abilla

MARGARET BRANICK-ABILLA

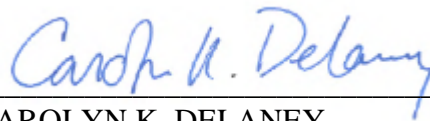
16 Special Assistant United States Attorney

17 Attorneys for Defendant

18
19 **[PROPOSED] ORDER**

20 Pursuant to stipulation, IT IS SO ORDERED.

21
22 Dated: November 26, 2018

23 

24 CAROLYN K. DELANEY

25 UNITED STATES MAGISTRATE JUDGE