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

12 ZAK FRANKLIN HAY) Civil No.: 2:18-cv-01706-EFB
 13)
 14 Plaintiff,) **STIPULATION FOR EXTENSION OF**
) **TIME AND**
 15 vs.) **PROPOSED ORDER**
)
 16 ANDREW SAUL,)
 17 Commissioner of Social Security,)
)
 18 Defendant.¹)
 19)
 20)

21 IT IS HEREBY STIPULATED, by and between Zak Franklin Hay (Plaintiff) and Andrew
 22 Saul, Commissioner of Social Security (Defendant), by and through their respective counsel of
 23 record, that, with the Court’s approval, Defendant shall have an extension of time of sixty (60)
 24 days to file his Opposition to Plaintiff’s Opening Brief. The current due date is July 10, 2019. The

25
 26 ¹ Andrew Saul is now the Commissioner of Social Security and is automatically substituted as a
 27 party pursuant to Fed. R. Civ. P. 25(d). See also section 205(g) of the Social Security Act, 42
 28 USC 405(g)(action survives regardless of any change in the person occupying the office of
 Commissioner of Social Security).

1 new date will be September 10, 2019. All other deadlines will extend according to the Court's
2 Scheduling Order.

3 Defense counsel needs an extension of time because she needs more time to complete
4 review and analysis of the 2,000 page record, consider the issues raised in Plaintiff's 38 page brief,
5 including a novel military substantial gainful activity issue, determine whether options exist for
6 settlement, accommodate competing workload demands (including seven other briefs due this
7 month), draft the response, go through the necessary in-house reviews, and go on vacation with
8 family in August. Defense counsel's office has three attorneys out on extended leave and at this
9 time, management has been unable to transfer this case to another attorney to handle due to
10 everyone having a full caseload. This request is made in good faith with no intention to delay
11 unduly the proceedings. Counsel apologizes to the Court, Plaintiff, and counsel for any
12 inconvenience this delay may cause.

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14 This is Defendant's first request for an extension.

15
16 Respectfully submitted,

17 Dated: July 2, 2019

18 MCGREGOR W. SCOTT
19 United States Attorney
20 DEBORAH LEE STACHEL
21 Regional Chief Counsel, Region IX
22 Social Security Administration

23 By: /s/ S. Wyeth McAdam
24 S. WYETH MCADAM
25 Special Assistant United States Attorney
26 Attorneys for Defendant

27 /s/ Robert Weems
28 Robert Weems
Weems Law Office
Attorney for Plaintiff
(*As authorized via e-mail on July 2, 2019)

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ORDER

GOOD CAUSE APPEARING, PURSUANT TO STIPULATION, DEFENDANT SHALL FILE HIS ~~OPPOSITION TO PLAINTIFF'S OPENING BRIEF~~ **MOTION FOR SUMMARY JUDGMENT AND/OR REMAND** ON OR BEFORE SEPTEMBER 10, 2019.

Dated: July 10, 2019.



THE HONORABLE EDMUND F. BRENNAN
UNITED STATES MAGISTRATE JUDGE