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9 Attorneys for Defendant

10 **UNITED STATES DISTRICT COURT**  
 11 **NORTHERN DISTRICT OF CALIFORNIA**  
 12 **SAN FRANCISCO DIVISION**

13		)	Case No. 3:18-cv-03098-EDL
14	WALTER BILLUPS,	)	<b>STIPULATION AND <del>PROPOSED</del> ORDER FOR AN EXTENSION OF TIME</b>
15	Plaintiff,	)	
16	vs.	)	
17	NANCY A. BERRYHILL,	)	
18	Acting Commissioner of Social Security,	)	
19	Defendant.	)	

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22 IT IS HEREBY STIPULATED, by and between the parties through their respective  
 23 counsel of record, with the Court’s approval, that Defendant shall have a 21-day extension of  
 24 time, from December 13, 2018 to January 3, 2019, for Defendant to respond to Plaintiff’s Motion  
 25 for Summary Judgment (Dkt. No. 18).  
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1 This is Defendant's first request for an extension of time. Defendant submits that good  
2 cause exists for this extension because the parties have recently engaged in settlement  
3 discussions and could not agree on the issue of remedy. Defendant anticipates filing a Motion  
4 for Remand, which will significantly reduce the number of issues that this Court will need to  
5 resolve and will largely focus on whether this matter should be remanded for further proceedings  
6 or an award of benefits. The requested extension will also help accommodate Defendant's  
7 counsel's workload, which includes a Ninth Circuit answering brief, numerous other district  
8 court cases, and other substantive non-litigation matters within the Office of General Counsel.  
9 Defendant's counsel will endeavor to complete the response as soon as possible. This request is  
10 made in good faith and with no intention to unduly delay the proceedings, and counsel  
11 apologizes for any inconvenience.

12 Plaintiff does not oppose Defendant's request for an extension of time. The parties  
13 further stipulate that the deadline for any reply by Plaintiff will be extended accordingly.

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16 Respectfully submitted,

17 Dated: December 12, 2018

Anne M. Su

(\*as authorized via email on December 11, 2018)

ANNE M. SU

Attorney for Plaintiff

20  
21 Dated: December 12, 2018

ALEX G. TSE

Acting United States Attorney

DEBORAH LEE STACHEL

Regional Chief Counsel, Region IX

Social Security Administration

24  
25 By: /s/ Allison J. Cheung

ALLISON J. CHEUNG

Special Assistant U.S. Attorney

Attorneys for Defendant

ORDER

Pursuant to stipulation, IT IS SO ORDERED.

Dated: 12/12/18

  
THE HONORABLE ELIZABETH D. LAPORTE  
United States Magistrate Judge

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