

1 MCGREGOR W. SCOTT  
United States Attorney  
2 DEBORAH LEE STACHEL, CSBN 230138  
Regional Chief Counsel, Region IX  
3 Social Security Administration  
ASIM H. MODI, NYSBN 4692018  
4 Special Assistant United States Attorney  
160 Spear Street, Suite 800  
5 San Francisco, CA 94105  
6 Telephone: 415-977-8952  
7 Facsimile: 415-744-0134  
Email: asim.modi@ssa.gov  
8 Attorneys for Defendant

9  
10 **UNITED STATES DISTRICT COURT**  
11 **EASTERN DISTRICT OF CALIFORNIA**  
12 **SACRAMENTO DIVISION**

13 CATHERINE HALL-KANELIS,	)	Case No.: 2:18-cv-00301-AC
	)	
14 Plaintiff,	)	<b>STIPULATION AND [PROPOSED]</b>
	)	<b>ORDER TO EXTEND BRIEFING</b>
15 v.	)	<b>SCHEDULE</b>
	)	
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  
ASIM H. MODI  
23 Special Assistant United States Attorney  
24 Attorneys for Defendant

25 ORDER

26 APPROVED AND SO ORDERED

27 DATED: August 21, 2018

28   
ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE