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3	Regional Chief Counsel DANIEL P. TALBERT		
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7	Attorneys for Defendant		
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9			
10	UNITED STATES DISTRICT COURT		
11	EASTERN DISTRICT OF CALIFORNIA		
12	FRESNO DIVISION		
13			
14	RODOLFO RODRIGUEZ,	No. 1:20-cv-00197-GSA	
15	Plaintiff,		
16	v.	STIPULATION AND ORDER FOR A FIRST EXTENSION OF THIRTY DAYS FOR	
17	ANDREW SAUL, Commissioner of Social Security,	DEFENDANT'S OPPOSITION TO PLAINTIFF'S OPENING BRIEF	
18	Defendant.		
19			
20	The parties stipulate by counsel that Defendant shall have an extension of thirty days, until		
21	November 18, 2020, to file his opposition to Plaintiff's opening brief. Good cause exists for this		
22	extension, as explained below.		
23	The originally assigned attorney for Defendant left the office, requiring reassignment to		
24	another attorney for filing. However, because of workload inconsistencies between the regional		
25	offices in the Office of General Counsel, an attorney in the Denver region has been assigned to		
26	brief this case, and the undersigned attorney for Defendant will review, revise, and file the		
27	opposition. Because this is a new procedure, the undersigned attorney for Defendant		
28	inadvertently delayed in informing the briefing	attorney that Plaintiff had filed his opening brief,	

1	and the briefing attorney will require an additional thirty days from the current due date to	
2	complete the opposition to Plaintiff's opening brief and share with the undersigned attorney for	
3	review and finalization before filing.	
4	For all these reasons, Defendant requests an extension of thirty days to file his opposition	
5	to Plaintiff's opening brief. Plaintiff's counsel has no objection to this request.	
6	Respectfully submitted October 15, 2020.	
7		
8	DATED: October 15, 2020 <u>/s/ Jacqueline Forslund</u> JACQUELINE FORSLUND	
9	(as authorized by email) Attorney for Plaintiff	
10	McGREGOR W. SCOTT	
11	United States Attorney	
12	DATED: October 15, 2020 By <u>s/ Daniel P. Talbert</u> DANIEL P. TALBERT	
13	Special Assistant United States Attorney	
14	Attorneys for Defendant	
15		
16	IT IS SO ORDERED.	
17	Dated: October 16, 2020 /s/ Gary S. Austin	
18	Dated: October 16, 2020 /s/ Gary S. Austin UNITED STATES MAGISTRATE JUDGE	
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