

McGREGOR W. SCOTT
United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel
DANIEL P. TALBERT
Special Assistant United States Attorney
Social Security Administration
160 Spear Street, Suite 800
San Francisco, CA 94105
Telephone: (415) 977-8995
Facsimile: (415) 744-0134
Attorneys for Defendant

Attorneys for Defendant

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

RODOLFO RODRIGUEZ,

No. 1:20-cv-00197-GSA

Plaintiff,

V.

ANDREW SAUL,
Commissioner of Social Security,

STIPULATION AND ORDER FOR A
SECOND EXTENSION OF THIRTY DAYS
FOR DEFENDANT'S OPPOSITION TO
PLAINTIFF'S OPENING BRIEF

Defendant.

The parties stipulate by counsel that Defendant shall have an extension of thirty days, until December 18, 2020, to file his opposition to Plaintiff's opening brief. Good cause exists for this extension, as explained below.

The originally assigned attorney for Defendant left the office, requiring reassignment to another attorney for filing. However, because of workload inconsistencies between the regional offices in the Office of General Counsel, an attorney in the Denver region has been assigned to brief this case, and the undersigned attorney for Defendant will review, revise, and file the opposition. The attorney responsible for briefing this case has been ill and was out of the office in recent weeks, precluding him from working on this brief; he anticipates being out of the office

1 throughout this week and next week, and will therefore require additional time to brief this case,
2 and for the undersigned attorney for Defendant to review and file that brief. The undersigned
3 attorney for Defendant is currently reviewing briefs for two new attorneys in his office this week
4 and preparing for an oral argument before the Ninth Circuit this week, and does not anticipate
5 being able to brief the case this week either.

6 For all these reasons, Defendant requests an extension of thirty days to file his opposition
7 to Plaintiff's opening brief. Plaintiff's counsel has no objection to this request.

8 Respectfully submitted November 16, 2020.

9 DATED: November 16, 2020

/s/ Jacqueline Forslund
10 JACQUELINE FORSLUND
11 (as authorized by email)
Attorney for Plaintiff

12 MC GREGOR W. SCOTT
13 United States Attorney

14 DATED: November 16, 2020

By *s/ Daniel P. Talbert*
15 DANIEL P. TALBERT
16 Special Assistant United States Attorney
17 Attorneys for Defendant

18 ORDER

19 Good cause appearing, Defendant is granted an additional thirty days to file his opposition
20 to Plaintiff's opening brief, until December 18, 2020.

21 IT IS SO ORDERED.

22 Dated: November 17, 2020

/s/ Gary S. Austin
23 UNITED STATES MAGISTRATE JUDGE