

1 MCGREGOR W. SCOTT
United States Attorney
2 DEBORAH LEE STACHEL
Regional Chief Counsel
3 DANIEL P. TALBERT
Special Assistant United States Attorney
4 Social Security Administration
160 Spear Street, Suite 800
5 San Francisco, CA 94105
Telephone: (415) 977-8995
6 Facsimile: (415) 744-0134
Attorneys for Defendant
7
8
9

10 UNITED STATES DISTRICT COURT
11 EASTERN DISTRICT OF CALIFORNIA
12 FRESNO DIVISION
13

14 RODOLFO RODRIGUEZ,
15 Plaintiff,
16 v.
17 ANDREW SAUL,
Commissioner of Social Security,
18 Defendant.
19

No. 1:20-cv-00197-GSA

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

20 The parties stipulate by counsel that Defendant shall have an extension of thirty days, until
21 December 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. The attorney responsible for briefing this case has been ill and was out of the office
28 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
10 DATED: November 16, 2020

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

12 MCGREGOR W. SCOTT
13 United States Attorney

14 DATED: November 16, 2020

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

17 ORDER

18
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
23 Dated: November 17, 2020

/s/ Gary S. Austin
UNITED STATES MAGISTRATE JUDGE