1 2 3 4 5 6 7 8	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	
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10	UNITED STATES DISTRICT COURT	
11	EASTERN DISTRICT OF CALIFORNIA	
12	FRESNO DIVISION	
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14	JUAN JOSE RIVERA,	No. 1:20-cv-00428-EPG
15	Plaintiff,	STIPULATION AND ORDER FOR A FIRST
16	V.	EXTENSION OF THIRTY DAYS FOR
17	ANDREW SAUL, Commissioner of Social Security,	DEFENDANT'S OPPOSITION TO PLAINTIFF'S OPENING BRIEF
18	Defendant.	
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20	The parties stipulate by counsel that Defendant shall have an extension of thirty days, until	
21	March 24, 2021, to file his opposition to Plaintiff's opening brief. Good cause exists for this	
22	extension, as explained below.	
23	The undersigned counsel for Defendant has been unable to prepare an opposition to	
24 25	Plaintiff's brief, because he had to prepare for and present oral argument in two cases to the	
25 26	United States Court of Appeals for the Ninth Circuit this week, and draft and file answering briefs in two other cases. Coursel for Defendant is responsible also for reviewing briefs for two new	
26 27	in two other cases. Counsel for Defendant is responsible also for reviewing briefs for two new attorneys in his office, one of whom will take this case for briefing. Additional time will be	
27 28		his case to review the record and draft a brief, and
20	interesting to allow the new attorney aborghout	

1	for counsel of record for Defendant to review and file that brief.	
2	For all these reasons, Defendant requests an extension of thirty days to file his opposition	
3	to Plaintiff's opening brief. Plaintiff's counsel has no objection to this request.	
4	Respectfully submitted February 12, 2021.	
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6	DATED: February 12, 2021	<u>/s/ Jonathan Pena</u> JONATHAN PENA
7		(as authorized by email) Attorney for Plaintiff
8		McGREGOR W. SCOTT
9		United States Attorney
10	DATED: February 12, 201 By	<u>s/ Daniel P. Talbert</u> DANIEL P. TALBERT
11		Special Assistant United States Attorney
12		Attorneys for Defendant
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1	<u>ORDER</u>	
2	Pursuant to the stipulation of the parties (ECF No. 16), IT IS ORDERED that Defendant	
3	shall file a response to Plaintiff's opening brief no later than March 24, 2021. All subsequent	
4	deadlines are extended accordingly.	
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6	IT IS SO ORDERED.	
7	Dated: February 16, 2021 /s/ Enin P. Shorp	
8	UNITED STATES MAGISTRATE JUDGE	
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