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9 Attorney for Plaintiff

10 **UNITED STATES DISTRICT COURT**  
11 **EASTERN DISTRICT OF CALIFORNIA**

12 Gloria Estella Hernandez,  
13 Plaintiff,

14 vs.

15 Kilolo Kijakazi, Acting  
16 Commissioner of Social Security,  
17 Defendant.  
18  
19

Case No. 1:20-cv-01112-DAD-BAM  
STIPULATION AND ORDER FOR  
EXTENSION OF TIME

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21 IT IS HEREBY STIPULATED, by and between the parties through their  
22 respective counsel of record, with the Court's approval, that Plaintiff shall have a  
23 60-day extension of time, from January 10, 2022 to March 11, 2022, for Plaintiff to  
24 serve on defendant with PLAINTIFF'S OPENING BRIEF. All other dates in the  
25 Court's Scheduling Order shall be extended accordingly.

26 This is Plaintiff's first request for an extension of time. Good cause exists  
27 for this request. Counsel for the Plaintiff is currently in Houston, Texas due to a  
28 family emergency involving Counsel's father who is gravely ill with Leukemia.

1 (See Declaration by Dolly M. Trompeter). Counsel for the Plaintiff is a principal  
2 caregiver. Additionally, Counsel has limited access to her computer and will  
3 require additional time to brief this matter upon her return to California.

4 Defendant does not oppose the requested extension. Counsel apologizes to  
5 the Defendant and Court for any inconvenience this may cause.

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7 Respectfully submitted,

8 Dated: January 10, 2022

PENA & BROMBERG, ATTORNEYS AT LAW

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10 By: /s/ Dolly M. Trompeter  
11 DOLLY M. TROMPETER  
12 Attorneys for Plaintiff

13  
14 Dated: January 10, 2022

PHILLIP A. TALBERT  
United States Attorney  
PETER K. THOMPSON  
Acting Regional Chief Counsel, Region IX  
Social Security Administration

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19 By: \*/s/ Sathya Oum  
20 Sathya Oum  
21 Special Assistant United States Attorney  
22 Attorneys for Defendant  
23 (\*As authorized by email on January 10, 2022)  
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IT IS SO ORDERED.

/s/ Barbara A. McAuliffe  
UNITED STATES MAGISTRATE JUDGE