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

13 Eileen Gonzalez,
14 Plaintiff,

15 vs.

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

Case No. 1:21-cv-00398-SKO (SS)

STIPULATION AND ORDER FOR
EXTENSION OF TIME

(Doc. 17)

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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 30-day extension of time, from January 14, 2022 to March 15, 2022, for Plaintiff to
24 serve on defendant with PLAINTIFF'S MOTION FOR SUMMARY
25 JUDGMENT. All other dates in the Court's Scheduling Order shall be extended
26 accordingly.

27 This is Plaintiff's second request for an extension of time. Good cause
28 exists for this request. Counsel for the Plaintiff is currently in Houston, Texas due

1 to a family emergency involving Counsel's father who is gravely ill with
2 Leukemia. (See Declaration by Dolly M. Trompeter). Counsel for the Plaintiff is
3 a principal caregiver. Additionally, Counsel has limited access to her computer and
4 will require additional time to brief this matter upon her return to California.

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

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8 Respectfully submitted,

9 Dated: January 5, 2022

PENA & BROMBERG, ATTORNEYS AT LAW

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

14
15 Dated: January 5, 2022

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

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20 By: */s/ Sarah E. Preston
21 Sarah E. Preston
22 Special Assistant United States Attorney
23 Attorneys for Defendant
24 (*As authorized by email on January 5, 2022)
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IT IS HEREBY ORDERED that Plaintiff shall have an extension of time, to and including March 15, 2022, in which to file Plaintiff's motion for summary judgment. All other deadlines set forth in the Scheduling Order (Doc. 14) shall be extended accordingly.

Dated: **January 6, 2022**

UNITED STATES MAGISTRATE JUDGE