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9 Attorney for Plaintiff

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

13 MARIA ESTELLA ROJAS,  
14 Plaintiff,

15 vs.

16 KILOLO KIJAKAZI, Acting  
17 Commissioner of Social Security,  
18 Defendant.

Case No. 1:21-cv-00831-BAM

STIPULATION AND ~~PROPOSED~~  
ORDER FOR EXTENSION OF  
TIME

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20  
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 36-day extension of time, from August 3, 2022 to September 8, 2022, for Plaintiff  
24 to serve on defendant with PLAINTIFF'S OPENING BRIEF. All other dates in  
25 the Court's Scheduling Order shall be extended accordingly.

26 This is Plaintiff's third request for an extension of time. Plaintiff  
27 respectfully states that the requested extension is necessary due several merit briefs  
28

1 being due on the same week. For the week of August 1, 2022 and August 8, 2022,  
2 Counsel for Plaintiff has 7 merit briefs, and several letter briefs and reply briefs.

3 Counsel requires additional time to brief the issues thoroughly for the  
4 Court's consideration. Defendant does not oppose the requested extension.  
5 Counsel apologizes to the Defendant and Court for any inconvenience this may  
6 cause.

7  
8 Respectfully submitted,

9 Dated: August 1, 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: August 1, 2022

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

21 By: \*/s/ Katherine Bennett Watson

22 Katherine Bennett Watson  
23 Special Assistant United States Attorney  
24 Attorneys for Defendant  
25 (\*As authorized by email on August 1, 2022)  
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27  
28

1 **ORDER**

2 Pursuant to the parties' stipulation, and cause appearing, Plaintiff's third  
3 request for an extension of time to file an Opening Brief is GRANTED. Plaintiff  
4 shall file an Opening Brief on or before September 8, 2022. All other deadlines in  
5 the Court's Scheduling Order are modified accordingly. No further extensions of  
6 time will be granted absent a demonstrated showing of good cause.

7  
8 IT IS SO ORDERED.

9 Dated: August 2, 2022

/s/ Barbara A. McAuliffe  
10 UNITED STATES MAGISTRATE JUDGE