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Attorney for Plaintiff

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

Oralia Garcia Esparza,
Plaintiff,

vs.

Kilolo Kijakazi, Acting
Commissioner of Social Security,
Defendant.

Case No. 1:21-cv-00991-SKO
STIPULATION AND ORDER FOR
EXTENSION OF TIME
(Doc. 13)

IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Plaintiff shall have a 60-day extension of time, from January 7, 2022 to March 8, 2022, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT. All other dates in the Court's Scheduling Order shall be extended accordingly.

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

1 family emergency involving Counsel's father who is gravely ill with Leukemia.
2 (See Declaration by Dolly M. Trompeter). Counsel for the Plaintiff is a principal
3 caregiver. Additionally, Counsel has limited access to her computer and will
4 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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9 Respectfully submitted,

10 Dated: January 5, 2022

PENA & BROMBERG, ATTORNEYS AT LAW

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

15
16 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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21 By: */s/ Patrick Snyder
22 Patrick Snyder
23 Special Assistant United States Attorney
24 Attorneys for Defendant
25 (*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 8, 2022, in which to file Plaintiff's motion for summary judgment. All other deadlines set forth in the Scheduling Order (Doc. 11) shall be extended accordingly.

Dated: **January 7, 2022**

UNITED STATES MAGISTRATE JUDGE