

1 PHILLIP A. TALBERT
2 United States Attorney
3 DEBORAH LEE STACHEL
4 Regional Chief Counsel, Region IX
5 Social Security Administration
6 SHARON LAHEY
7 Special Assistant United States Attorney
8 Social Security Administration
9 160 Spear Street, Suite 800
10 San Francisco, California 94105
11 Telephone: (510) 970-4827
12 Email: sharon.lahey@ssa.gov

13 Attorneys for DEFENDANT

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UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

KAREN P. WESCOTT,) CIVIL NO. 1:21-cv-01323-BAM
15 Plaintiff,)
16 vs.) STIPULATION AND PROPOSED ORDER
17 KILOLO KIJAKAZI, Acting Commissioner) FOR EXTENSION OF TIME NUNC PRO
18 Of Social Security,) TUNC
19 Defendant.)
20)

21 IT IS HEREBY STIPULATED, by and between Karen P. Wescott (“Plaintiff”) and Kilolo
22 Kijakazi, Acting Commissioner of Social Security (“Defendant”) (collectively, the “Parties”), by and
23 through their respective counsel of record that the time for Defendant to respond to Plaintiff’s Motion
24 for Summary Judgment (ECF No. 15) be extended by 30 days. The deadline was November 2, 2022,
25 and the new deadline would be December 7, 2022. This is the second extension of time requested in the
26 above-captioned matter and the first extension of time requested concerning Defendant’s response to
27 Plaintiff’s Motion for Summary Judgment. The Parties respectfully request this additional time because
28 it has recently come to the undersigned defense counsel’s attention that Defendant’s response is past-

STIPULATION AND PROPOSED ORDER

CASE NO.: 1:21-cv-01323-BAM

1 due, however, the attorney responsible for briefing this case, Marla Letellier, Esq., is unexpectedly out
2 of the office on leave. Defense counsel apologizes to the Court and Plaintiff for the timing of this
3 request and attendant inconvenience. The Parties respectfully request that all other deadlines be
4 modified accordingly.

5 Date: November 18, 2022

6 LOTT LAW OFFICES

7 By: /s/ Shellie Lott*

8 SHELLIE LOTT

9 (*Authorized by e-mail on November 18, 2022)
10 Attorneys for Plaintiff

11 Date: November 18, 2022

12 PHILLIP A. TALBERT

13 United States Attorney

14 By: /s/ Sharon Lahey

15 SHARON LAHEY

16 Special Assistant United States Attorney

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18 ORDER

19 Pursuant to stipulation, and good cause appearing, Defendant's request for an extension of time
20 to respond to Plaintiff's Motion for Summary Judgment is GRANTED nunc pro tunc. Defendant shall
21 file a response to Plaintiff's Motion for Summary Judgment on or before December 7, 2022. All other
22 deadlines in the Court's Scheduling Order are modified accordingly.

23 IT IS SO ORDERED.

24 Dated: November 18, 2022

25 /s/ Barbara A. McAuliffe

26 UNITED STATES MAGISTRATE JUDGE