

Attorneys for Defendant

CELIA ZAMILPA,

Plaintiff,

V.

KILOLO KIJAKAZI,  
Acting Commissioner of Social Security,  
Defendant.

Civil No. 1:21-cv-01702-SKO

## STIPULATION AND ORDER TO EXTEND BRIEFING SCHEDULE

**(Doc. 12)**

1 The parties stipulate through counsel that Defendant, the Acting Commissioner of Social  
2 Security (the “Commissioner”), shall have an extension of 14 days to respond to Plaintiff’s Motion for  
3 Summary Judgment in this case. In support of this request, the Commissioner respectfully states as  
4 follows:

5 1. The Commissioner’s response to Plaintiff’s Motion for Summary Judgment is due  
6 September 15, 2022. This is Defendant’s first request for an extension of this deadline.

7 2. Counsel for the Commissioner is consulting with his client about the defensibility of this  
8 case. Counsel for the Commissioner believes that this short extension may resolve this matter without  
9 necessitating this Court to address the merits of this matter. Moreover, this brief extension would  
10 conserve judicial time and resources should the Parties be able to resolve this matter.

11 3. Counsel for the Commissioner has consulted with Plaintiff’s counsel who advised that  
12 he has no objections.

13 4. This request is made in good faith and is not intended to delay the proceedings in this  
14 matter.

15 WHEREFORE, Defendant requests until September 29, 2022, respond to Plaintiff’s Motion for  
16 Summary Judgment.

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18 Date: September 16, 2022

LAW OFFICES OF FRANCISCO BENAVIDES

19 By: /s/ Caspar Chan for Francisco Benavides\*  
20 FRANCISCO BENAVIDES

21 \*Authorized by email on September 16, 2022  
Attorneys for Plaintiff

22 Date: September 16, 2022

23 PHILIP A. TALBERT  
United States Attorney  
Eastern District of California

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25 By: /s/ Caspar Chan  
CASPAR CHAN  
26 Special Assistant United States Attorney  
27 Attorneys for Defendant  
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1 ORDER

2 Pursuant to the foregoing stipulation (Doc. 12), and for good cause shown,

3 IT IS HEREBY ORDERED that Defendant shall have an extension, up to and including  
4 September 29, 2022, to file the response to Plaintiff's opening brief. All other dates in the Scheduling  
5 Order (Doc. 9) shall be extended accordingly.  
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8 IT IS SO ORDERED.

9 Dated: September 16, 2022

10 /s/ Sheila K. Oberto  
11 UNITED STATES MAGISTRATE JUDGE  
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