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

12 DANIELLA VIVIANA MIRANDA MEDINA,)
13 Plaintiff,)
14 v.)
15)
16 KILOLO KIJAKAZI,)
17 Acting Commissioner of Social Security,)
18 Defendant.)

Civil No. 1:22-cv-00519-GSA
**STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFF'S
COMPLAINT**

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21 The parties stipulate through counsel that Defendant, the Acting Commissioner of Social Security
22 (the "Commissioner"), shall have an extension of time to respond to Plaintiff's Complaint in this case.
23 In support of this request, the Commissioner respectfully states as follows:

- 24 1. Defendant's response to Plaintiff's Complaint is due August 1, 2022. Defendant has not
25 previously requested an extension of this deadline.
26 2. Defendant's counsel was added as an attorney to this case on July 29, 2022.
27 3. The certified administrative record (CAR) in this case has not been finalized for filing.
28 The agency's Office of Appellate Operations (OAO) is responsible for preparation of CARs. Counsel

1 for the Commissioner is in contact with OAO to ensure that the CAR is properly certified for filing.
2 Accordingly, Defendant requests an extension of 60 days to respond to Plaintiff's Complaint.

3 4. Counsel for the Commissioner has consulted with Plaintiff's counsel who advised that he
4 has no objections.

5 5. This request is made in good faith and is not intended to delay the proceedings in this
6 matter.

7 WHEREFORE, Defendant requests until September 30, 2022, respond to Plaintiff's Complaint.

8 Respectfully submitted,

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10 Date: July 29, 2022

Law Offices of Francesco Benavides

11 By: /s/ Francesco Paulo Benavides *

12 Francesco Paulo Benavides

13 *Authorized by email on July 29, 2022

Attorneys for Plaintiff

14 Date: July 29, 2022

PHILIP A. TALBERT

15 United States Attorney

16 Eastern District of California

17 By: /s/ Margaret Lehrkind

MARGARET LEHRKIND

18 Special Assistant United States Attorney

19 Attorneys for Defendant

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21
22 ORDER

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24 IT IS SO ORDERED.

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26 Dated: July 29, 2022

/s/ Gary S. Austin

27 UNITED STATES MAGISTRATE JUDGE
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