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UNITED STATES DISTRICT COURT

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EASTERN DISTRICT OF CALIFORNIA

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14 LINDA ELAINE STITES-MOUNTS,

15 Plaintiff,

16 v.

17 KILOLO KIJAKAZI,

18 Acting Commissioner of Social Security,

19 Defendant.

No. 1:22-cv-00630-SKO

20 STIPULATED MOTION AND ORDER FOR
21 AN EXTENSION OF TIME TO RESPOND TO
22 PLAINTIFF'S MOTION FOR SUMMARY
23 JUDGMENT

24 (Doc. 14)

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IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court's approval, that Defendant's time for responding to Plaintiff's Motion for Summary Judgment be extended days forty-five days (45) days from January 19, 2023 to March 5, 2023. This is Defendant's first request for an extension. Plaintiff has no objection to Defendant's request for an extension.

Good cause exists for this request. Defendant respectfully requests this additional time because Counsel for Defendant has been unable to devote the time required to complete Defendant's response to Plaintiff's Motion for Summary Judgment given the current due date.

29
30 Stipulated Motion for Extension of Time; Order

1 Counsel has been out of the office since December 23, 2022 on vacation visiting family and was
2 to return home on January 4, 2023. Due to the storm hitting San Francisco and ensuing flight
3 cancellations, Counsel did not return home until January 6, 2023. Counsel now needs to take
4 unexpected leave because his grandmother is under hospice care and expected to pass in the
5 coming days. Given this situation and competing workload requirements an extension until
6 March 5, 2023 should provide an opportunity for the undersigned Counsel for Defendant to
7 complete the response to Plaintiff's Motion for Summary Judgment. Furthermore, a reassignment
8 of this matter to another staff attorney is currently not tenable given the high volume of cases that
9 all of our limited staff (due to leave and resignations) is handling. Counsel apologizes to the
10 Court for any inconvenience caused by this delay. All other dates in the Court's Scheduling
11 Order shall be extended accordingly.

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13 Respectfully submitted,

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15 PHILLIP A. TALBERT
United States Attorney

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DATE: January 13, 2023

17 By: s/ Oscar Gonzalez de Llano
OSCAR GONZALEZ DE LLANO
Special Assistant United States Attorney
18 Attorneys for Defendant

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20 Respectfully submitted,

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22 Attorneys for Plaintiff

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DATE: January 13, 2023

24 By: s/ William M. Kuntz *
William M. Kuntz
25 Law Offices of William M. Kuntz
26 (*as authorized by email)

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ORDER

Pursuant to the parties' foregoing stipulated motion (Doc. 14), and for good cause shown, IT IS ORDERED that Defendant shall have an extension, up to and including March 5, 2023, to file Defendant's Motion for Summary Judgment. All remaining deadlines in the Scheduling Order (Doc. 3) are extended accordingly.

IT IS SO ORDERED.

Dated: January 17, 2023

/s/ Sheila K. Oberto

UNITED STATES MAGISTRATE JUDGE