| 1 | PHILLIP TALBERT United States Attorney | | |
|----|--|--|--|
| 2 | MATHEW W. PILE, WSBA No. 32245 | | |
| 3 | Associate General Counsel Office of Program Litigation, Office 7 | | |
| 4 | Social Security Administration | | |
| 5 | MARY TSAI, CSBN 216963 Special Assistant United States Attorney | | |
| 6 | 6401 Security Boulevard Baltimore, MD 21235 | | |
| 7 | Telephone: 510-970-4864 | | |
| 8 | Facsimile: (415) 744-0134 E-Mail: mary.tsai@ssa.gov | | |
| 9 | Attorneys for Defendant | | |
| 10 | UNITED STATES DISTRICT COURT | | |
| 11 | EASTERN DISTRICT OF CALIFORNIA | | |
| 12 | FRESNO DIVISION | | |
| 13 | | Cose No. 1,22 ov 01210 SVO | |
| 14 | JEFFREY SCOTT BRONSON, | Case No.: 1:23-cv-01219-SKO | |
| 15 | Plaintiff, | STIPULATION AND UNOPPOSED MOTION FOR AN EXTENSION OF TIME; | |
| 16 | vs. | ORDER (D. 10) | |
| 17 | COMMISSIONER OF SOCIAL SECURITY, | (Doc. 18) | |
| | | | |
| 18 | Defendant. | | |
| 19 | | AFDY OFFINITE AFFINITE AT THE STATE OF THE S | |
| 20 | Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the | | |
| 21 | parties, through their respective counsel of record, that the time for Defendant to respond to | | |
| 22 | Plaintiff's motion for summary judgment be extended fifteen (15) days from February 20, 2024, | | |
| 23 | up to and including March 6, 2024. This is Defendant's first stipulation for an extension of the | | |
| 24 | Court's Scheduling Order. Defendant requests this extension because this case was recently | | |
| 25 | reassigned to undersigned counsel for Defendant and is currently due February 20, 2024. | | |
| 26 | However, counsel already has another brief due on that same day and six others due in February. | | |

Thus, Defendant requires an extension in this case, and requests this extension in good faith and

1

with no intent to delay these proceedings unnecessarily.

27

28

| 1 | The parties further stipulate that the Court's Scheduling Order shall be modified | |
|----|--|--|
| 2 | accordingly. | |
| 3 | | |
| 4 | | Respectfully submitted, |
| 5 | Dated: February 5, 2024 | /s/ Dolly Marlo Trompeter* |
| 6 | Dated. Teordary 5, 2024 | DOLLY MARLO TROMPETER |
| 7 | | Attorney for Plaintiff *as authorized via e-mail on February 2, 2024 |
| 8 | | as aumorized via e-maii on February 2, 2024 |
| | Dated: February 5, 2024 | PHILLIP TALBERT |
| 9 | | United States Attorney MATHEW W. PILE |
| 10 | | Associate General Counsel |
| 11 | | Office of Program Litigation, Office 7 |
| | | Social Security Administration |
| 12 | D | /o/ Marri Tani |
| 13 | By: | <u>/s/ Mary Tsai</u> MARY TSAI |
| 14 | | Special Assistant U.S. Attorney |
| | | Attorneys for Defendant |
| 15 | | 1 200 201 201 201 201 201 201 201 201 20 |
| 16 | | |
| 17 | <u>ORDER</u> | |
| 18 | Pursuant to the parties' stipulation and unopposed motion (Doc. 18), IT IS SO ORDERED | |
| 19 | that Defendant shall have an extension, up to and including March 6, 2024, to respond to Plaintiff's | |
| 20 | motion for summary judgment. All other deadlines in the Scheduling Order (Doc. 5) are enlarged | |
| 21 | accordingly. | |
| 22 | | |
| 23 | IT IS SO ORDERED. | |
| 24 | Dated: February 6, 2024 | Isl Sheila K. Oberto |
| | | UNITED STATES MAGISTRATE JUDGE |
| 25 | | |
| 26 | | |
| 27 | | |
| 28 | | |