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9	Attorneys for Defendant		
10	UNITED STATES DISTRICT COURT		
10	EASTERN DISTRICT OF CALIFORNIA FRESNO DIVISION		
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12			
13		Case No.: 1:24-cv-00561-KES-BAM	
14	JOEL CORDERO FLORES,		
14	Plaintiff,	STIPULATION FOR AN EXTENSION OF TIME; [PROPOSED] ORDER	
15	, , , , , , , , , , , , , , , , , , , ,	TIME, [I KOI OSED] OKDEK	
16	VS.		
16	COMMISSIONER OF SOCIAL SECURITY,		
17			
10	Defendant.		
18	Derendant.		

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Opening Brief be extended seven (7) days from November 14, 2024, up to and including November 21, 2024. This is the parties' third stipulation for an extension of the Court's Scheduling Order, and Defendant's first extension.

This is Defendant's first request for an extension, and it is made with good cause. This case was recently reassigned to undersigned counsel for Defendant, along with three other briefs, all of which are due in November 2024. In total, Moreover, counsel already has five briefs due by approximately mid-November. Thus, Defendant requires an extension in this case, and may

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1	require extensions in other cases, and requests this extension in good faith and with no intent to		
2	delay these proceedings unnecessarily.		
3	The parties further stipulate that the Court's Scheduling Order shall be modified		
4	accordingly.		
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6		Respectfully submitted,	
7	Dated: October 23, 2024	/s/ Jonathan Omar Pena*	
8		JONATHAN OMAR PENA	
9		Attorney for Plaintiff *as authorized via e-mail on October 23, 2024	
10			
11	Dated: October 23, 2024	PHILLIP TALBERT	
12		United States Attorney	
		MATHEW W. PILE Associate General Counsel	
13		Office of Program Litigation, Office 7	
14		Social Security Administration	
15	By:	<u>/s/ Mary Tsai</u>	
16		MARY TSAI Special Assistant U.S. Attorney	
17		Attorneys for Defendant	
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19	ORDER		
20	Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an		
21	extension, up to and including November 21, 2024 to respond to Plaintiff's Opening Brief. The		
22	remaining dates in the Court's Scheduling Order are modified accordingly.		
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24	IT IS SO ORDERED.		
25	Dated:	/s/ Barbara A. McAuliffe	
26		UNITED STATES MAGISTRATE JUDGE	
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	Stip. for Ext.; 1:24-cv-00561-KES-BAM 2		