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9 Attorneys for Defendant

10 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA

13 STEPHANIE LOREE HAMMACK,

14 Plaintiff,

15 vs.

16 COMMISSIONER OF SOCIAL SECURITY,

17 Defendant.

Civil No. 1:24-cv-00755-SKO

18 STIPULATION AND UNOPPOSED MOTION
FOR EXTENSION OF TIME; ORDER

(Doc. 14)

19
20 IT IS HEREBY STIPULATED by and between the parties, through their undersigned
21 attorneys, with this Court's approval, to extend the time by 33 days, from October 30, 2024 to
22 December 2, 2024, for Defendant to file his Cross-Motion for Summary Judgment. Plaintiff's
23 optional reply shall be due within 14 days after the filing of the Commissioner's Cross-Motion.

24 This is Defendant's first request for an extension of time. Plaintiff does not oppose the
25 requested extension.

26 The undersigned counsel for the Commissioner respectfully submits that good cause exists
27 for the requested extension. Due to ongoing staffing fluctuations and organizational changes, the
28 undersigned counsel for the Commissioner has been tasked with additional duties including

1 serving as a jurisdictional coordinator, reviewing other attorneys' work, training and mentoring
2 new attorneys, and handling more cases, including the instant case, which was recently reassigned
3 to her. The undersigned counsel for the Commissioner is also scheduled to be out of the office for
4 two weeks from late October into November. As a result, and despite diligent efforts to comply
5 with this Court's Scheduling Order, the Commissioner needs an extension in the instant case to
6 review the administrative record, consider the issues that Plaintiff has raised, confer with his
7 client as necessary, and prepare the Commissioner's Cross-Motion.

8 Respectfully submitted,

9 Dated: October 22, 2024

LAW OFFICES OF LAWRENCE D. ROHLFING

10 By: /s/ Steven G. Rosales*

11 STEVEN G. ROSALES

12 Attorneys for Plaintiff

13 [*As authorized by e-mail on Oct. 22, 2024]

14 Dated: October 23, 2024

PHILLIP A. TALBERT

15 United States Attorney

16 MATHEW W. PILE

Associate General Counsel

Office of Program Litigation, Office 7

17 By: /s/ Margaret Branick-Abilla

18 MARGARET BRANICK-ABILLA

19 Special Assistant United States Attorney

Attorneys for Defendant

20
21 **ORDER**

22 Pursuant to the parties' stipulation and unopposed motion (Doc. 14), IT IS ORDERED that
23 the Commissioner's Cross-Motion for Summary Judgment shall be due on December 2, 2024, and
24 Plaintiff's optional reply shall be due within 14 days after the filing of the Commissioner's Cross-
25 Motion.

26 IT IS SO ORDERED.

27 Dated: October 23, 2024

/s/ Sheila K. Oberto

28 UNITED STATES MAGISTRATE JUDGE

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