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Attorney for Plaintiff

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

Teresa Diane Baker,)	Case No. 1:24-cv-00899-SKO
Plaintiff,)	
vs.)	AMENDED STIPULATION AND
Carolyn Colvin, ACTING COMMISSIONER)	UNOPPOSED MOTION FOR
OF SOCIAL SECURITY ¹ ,)	EXTENSION OF TIME; ORDER
)	(Doc. 15)
)	
Defendant.)	
)	

Pending the Court’s approval, IT IS HEREBY STIPULATED, by and between the parties through their respective counsel of record, with the Court’s approval, that Plaintiff shall have a 14-day extension of time, from January 6, 2025 to January 21, 2025, for Plaintiff to serve on defendant with PLAINTIFF’S MOTION FOR SUMMARY JUDGMENT. All other dates in the Court’s Scheduling Order shall be extended accordingly.

This is Plaintiff’s second request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due several merit briefs being due on the same week.

¹ Carolyn Colvin became the Commissioner of Social Security on November 30, 2024. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Carolyn Colvin should be substituted for Martin O’Malley as the defendant in this suit. No further action need be taken to continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 For the weeks of January 6, 2025 and January 13, 2025 Plaintiff's Counsel has five merit briefs
2 due. Counsel requires additional time to brief the issues thoroughly for the Court's consideration.
3 Defendant does not oppose the requested extension. Counsel apologizes to the Defendant and
4 Court for any inconvenience this may cause.

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7 Respectfully submitted,

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9 Dated: January 6, 2025

PENA & BROMBERG, ATTORNEYS AT LAW

10 By: /s/ Jonathan Omar Pena

11 JONATHAN OMAR PENA

12 Attorneys for Plaintiff

13
14 Dated: January 6, 2025

PHILLIP A. TALBERT

15 United States Attorney

16 MATHEW W. PILE

17 Associate General Counsel

18 Office of Program Litigation

19 Social Security Administration

20 By: */s/ Justin Lane Martin

21 Justin Lane Martin

22 Special Assistant United States Attorney

23 Attorneys for Defendant

24 (*As authorized by email on January 6, 2025)

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1 **ORDER**

2 Pursuant to parties' foregoing stipulation and unopposed motion (Doc. 15), and for good
3 cause shown (Fed. R. Civ. P. 16(b)(4)),

4 IT IS ORDERED that Plaintiff shall have up to and including January 21, 2025, to serve
5 Plaintiff's Motion for Summary Judgment on Defendant. All other dates in the Scheduling
6 Order (Doc. 5) are enlarged accordingly.

7
8 IT IS SO ORDERED.

9 Dated January 6, 2025

/s/ Sheila K. Oberto
UNITED STATES MAGISTRATE JUDGE