PHILLIP TALBERT 1 **United States Attorney** MATHEW W. PILE, WSBA No. 32245 2 Associate General Counsel 3 Office of Program Litigation, Office 7 Social Security Administration 4 MARY TSAI, CSBN 216963 Special Assistant United States Attorney 5 6401 Security Boulevard 6 Baltimore, MD 21235 Telephone: 510-970-4864 7 Facsimile: (415) 744-0134 E-Mail: mary.tsai@ssa.gov 8 Attorneys for Defendant 9 UNITED STATES DISTRICT COURT 10 EASTERN DISTRICT OF CALIFORNIA 11 FRESNO DIVISION 12 13 Case No.: 1:24-cv-00935-GSA JEREMY ROBERT CLOVER, 14 STIPULATION FOR AN EXTENSION OF Plaintiff, TIME; ORDER 15 VS. 16 COMMISSIONER OF SOCIAL SECURITY, 17 18 Defendant. 19 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 Opening Brief be extended thirty (30) days from January 15, 2025, up to and 23 including February 14, 2025. This is the parties' second stipulation for an extension of the 24 Court's Scheduling Order, and Defendant's first extension. 25 This is Defendant's first request for an extension, and it is made with good cause. This 26 case was recently reassigned to undersigned counsel for Defendant, along with another brief,

Stip. for Ext.; 1:24-cv-00935-GSA

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both of which are due in January 2025. Moreover, counsel already has six other briefs due in

approximately the next month. Thus, Defendant requires an extension in this case, and may

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	4 accordingly.	accordingly.	
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6	6 Respectfully su	bmitted,	
7 8	Dated: January 8, 2025 /s/ Melissa Nev	VEL	
9		via e-mail on January 8, 2025	
10	0		
11			
12	United States A MATHEW W.	•	
13	Associate Gene	ral Counsel am Litigation, Office 7	
14	- 11		
15	5 By: /s/ Mary Tsai		
16	6 MARY TSAI		
17	7	nt U.S. Attorney	
18	Attorneys for D	etendant	
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20	<u>ORDER</u>		
	Pursuant to the parties' stipulation, IT IS ORDERED that Defendant shall have an		
21	extension, up to and including February 14, 2025 to respond to Plaintiff's Opening Brief.		
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24	II IS SO ONDERED.		
25	5 Dated: January 8, 2025 /s/	Gary S. Austin	
26		ATES MAGISTRATE JUDGE	
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