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9 Attorney for Plaintiff

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

12 ALISON JOY ISBELL,
13 Plaintiff,

14 vs.

15 LELAND DUDEK, ACTING
16 COMMISSIONER OF SOCIAL
SECURITY¹,

17 Defendant.
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Case No. 1:24-cv-01089-BAM

STIPULATION AND ~~PROPOSED~~
ORDER FOR EXTENSION OF
TIME

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21 Pending the Court's approval, IT IS HEREBY STIPULATED, by and
22 between the parties through their respective counsel of record, with the Court's
23 approval, that Plaintiff shall have a 3-day extension of time, from March 11, 2025
24 to March 14, 2025, for Plaintiff to serve on defendant with PLAINTIFF'S
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27 ¹ Leland Dudek became the Acting Commissioner of Social Security in February
28 2025. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Leland
Dudek is substituted as the defendant in this suit.

1 MOTION FOR SUMMARY JUDGMENT. All other dates in the Court's
2 Scheduling Order shall be extended accordingly.

3 This is Plaintiff's second request for an extension of time. Plaintiff
4 respectfully states that the requested extension is necessary due several merit briefs
5 being due on the same week. For the week of March 10, 2025, Plaintiff's Counsel
6 has three merit briefs and two reply briefs due. Counsel requires additional time to
7 brief the issues thoroughly for the Court's consideration. Defendant does not
8 oppose the requested extension. Counsel apologizes to the Defendant and Court
9 for any inconvenience this may cause.

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11 Respectfully submitted,

12 Dated: March 10, 2025

PENA & BROMBERG, ATTORNEYS AT LAW

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14 By: /s/ Dolly M. Trompeter
15 DOLLY M. TROMPETER
16 Attorneys for Plaintiff

17
18 Dated: March 10, 2025

PHILLIP A. TALBERT
United States Attorney
MATTHEW W. PILE
Associate General Counsel
Office of Program Litigation, Office 7

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23 By: */s/ Franco L. Becia
24 Franco L. Becia
25 Special Assistant United States Attorney
26 Attorneys for Defendant
27 (*As authorized by email on March 10, 2025)
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IT IS SO ORDERED.

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE