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Attorney for Plaintiff

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

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 3-day extension of time, from March 11, 2025 to March 14, 2025, for Plaintiff to serve on defendant with PLAINTIFF'S

<sup>1</sup> Leland Dudek became the Acting Commissioner of Social Security in February 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.

10  
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  
19 United States Attorney  
20 MATTHEW W. PILE  
21 Associate General Counsel  
22 Office of Program Litigation, Office 7  
23

24 By: \*/s/ Franco L. Bacia  
25 Franco L. Bacia  
26 Special Assistant United States Attorney  
27 Attorneys for Defendant  
28 (\*As authorized by email on March 10, 2025)

## ORDER

Pursuant to stipulation, and cause appearing, Plaintiff shall file a Motion for Summary Judgment on or before March 14, 2025. All other deadlines in the Court's Scheduling Order are modified accordingly.

IT IS SO ORDERED.

Dated: **March 11, 2025**

/s/ Barbara A. McAuliffe

UNITED STATES MAGISTRATE JUDGE