

1 PHILLIP A. TALBERT
 United States Attorney
 2 MATHEW W. PILE, WSBN 32245
 Associate General Counsel
 3 Office of Program Litigation, Office 7
 Social Security Administration
 4 NOAH SCHABACKER, Maryland Bar
 Special Assistant United States Attorney
 5 6401 Security Boulevard
 6 Baltimore, Maryland 21235
 7 Telephone: (303) 844-6232
 E-Mail: Noah.Schabacker@ssa.gov
 8 Attorneys for Defendant

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

11)	Case No.: 1:24-cv-01152-KES-SKO
12	SAVANAH BOHANNAN,)	
13	Plaintiff,)	STIPULATION AND UNOPPOSED
14	vs.)	MOTION FOR AN EXTENSION OF TIME;
15	MICHELLE KING,)	ORDER
16	Acting Commissioner of Social Security, ¹)	(Doc. 14)
17	Defendant.)	

18 Pending the Court’s approval, IT IS HEREBY STIPULATED, by and between the
 19 parties, through their respective counsel of record, that the time for Defendant to respond to
 20 Plaintiff’s Motion for Summary Judgment be extended from January 30, 2025, up to and
 21 including March 3, 2025. This is the Defendant’s first request for an extension.

22 This matter was assigned on January 7, 2025. Based on a review of the record,
 23 undersigned counsel requires additional time to explore settlement options. Defendant
 24 apologizes to the Court for any inconvenience caused by this delay. Undersigned counsel
 25

26 ¹ Michelle King became the Acting Commissioner of Social Security on January 20, 2025.
 27 Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Michelle King should be
 28 substituted for Carolyn Colvin 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 contacted Plaintiff's counsel on January 28, 2025; he indicated he had no objection to this
2 request.

3 The parties further stipulate that the Court's Scheduling Order shall be modified
4 accordingly.

5 Respectfully submitted,

6 Dated: January 28, 2025

/s/ Justin Prato*

(*as authorized via e-mail on January 28, 2025)

JUSTIN PRATO

Attorney for Plaintiff

9 Dated: January 28, 2025

PHILLIP A. TALBERT

United States Attorney

MATHEW W. PILE

Associate General Counsel

Social Security Administration

13 By: /s/ Noah Schabacker

NOAH SCHABACKER

Special Assistant U.S. Attorney

Attorneys for Defendant

17 **ORDER**

18 Pursuant to parties' foregoing stipulation and unopposed motion (Doc. 14), and for good
19 cause shown (Fed. R. Civ. P. 16(b)(4)), IT IS ORDERED that Defendant shall have up to and
20 including to March 3, 2025, to respond to Plaintiff's Motion for Summary Judgment. All other
21 dates in the Scheduling Order (Doc. 5) are enlarged accordingly.

22
23 IT IS SO ORDERED.

24 Dated: January 29, 2025

/s/ Sheila K. Oberto

UNITED STATES MAGISTRATE JUDGE