

MICHELE BECKWITH
Acting United States Attorney
MATHEW W. PILE, WSBA No. 32245
Associate General Counsel
Office of Program Litigation, Office 7
Social Security Administration
MARY TSAI, CSBN 216963
Special Assistant United States Attorney
6401 Security Boulevard
Baltimore, MD 21235
Telephone: 510-970-4864
Facsimile: (415) 744-0134
E-Mail: mary.tsai@ssa.gov
Attorneys for Defendant

Attorneys for Defendant

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
FRESNO DIVISION

STEVEN VANG,) Case No.: 1:24-cv-01292-KES-GSA
Plaintiff,)
vs.) STIPULATION FOR A SECOND
COMMISSIONER OF SOCIAL SECURITY,) EXTENSION OF TIME; ORDER
Defendant.)

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's motion for summary judgment be extended four (4) days from March 24, 2025, up to and including March 28, 2025. This is the parties' second stipulation for an extension of the Court's Scheduling Order, and Defendant's second extension.

Defendant's request is made with good cause. Undersigned counsel for Defendant has been out ill this week and must accompany her elderly father to last-minute medical appointments over the next week, including on March 13, 14, and 19, 2025. Moreover, counsel has other litigation deadlines due in the next two weeks. Thus, Defendant requires an extension

1 in this case, and may require extensions in other cases, and requests this extension in good faith
2 and with no intent to delay these proceedings unnecessarily.

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

5
6 Respectfully submitted,

7 Dated: March 12, 2025

/s/ Jonathan Omar Pena*
8 JONATHAN OMAR PENA
9 Attorney for Plaintiff
*as authorized via e-mail on March 12, 2025

10 Dated: March 12, 2025

11 MICHELE BECKWITH
12 Acting United States Attorney

13 MATHEW W. PILE
14 Associate General Counsel
15 Office of Program Litigation, Office 7
Social Security Administration

16 By: /s/ Mary Tsai
17 MARY TSAI
18 Special Assistant U.S. Attorney
19 Attorneys for Defendant

20 **ORDER**

21 Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an
22 extension, up to and including March 28, 2025 to respond to Plaintiff's motion for summary
23 judgment.

24 IT IS SO ORDERED.

25 Dated: March 12, 2025

/s/ Gary S. Austin
26 UNITED STATES MAGISTRATE JUDGE