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

Paeng See,
Plaintiff,
vs.
Michelle King, ACTING
COMMISSIONER OF SOCIAL
SECURITY¹,
Defendant.

Case No. 1:24-cv-01516-GSA
STIPULATION AND ORDER FOR
EXTENSION OF TIME

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 60-day extension of time, from March 13, 2025 to May 12, 2025, for Plaintiff to serve on defendant with PLAINTIFF'S MOTION

1 Michelle King became the Acting Commissioner of Social Security on January
23, 2025. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Michelle
King should be 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).

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

This is Plaintiff's first request for an extension of time. Plaintiff respectfully states that the requested extension is necessary due several merit briefs being due on the same week. For the weeks of March 10, 2025 and March 17, 2025, Plaintiff's Counsel has fifteen Merit Briefs due. Counsel requires additional time to brief the issues thoroughly for the Court's consideration. Defendant does not oppose the requested extension. Counsel apologizes to the Defendant and Court for any inconvenience this may cause.

Respectfully submitted,

Dated: March 4, 2025 PENA & BROMBERG, ATTORNEYS AT LAW

By: /s/ Jonathan Omar Pena
JONATHAN OMAR PENA
Attorneys for Plaintiff

Dated: March 4, 2025

PHILLIP A. TALBERT
United States Attorney
MATHEW W. PILE
Associate General Counsel
Office of Program Litigation
Social Security Administration

By: */s/ Justin Lane Martin
Justin Lane Martin
Special Assistant United States Attorney
Attorneys for Defendant
(*As authorized by email on March 4, 2025)

ORDER

Pursuant to stipulation,

IT IS SO ORDERED.

Dated: March 5, 2025

/s/ Gary S. Austin

UNITED STATES MAGISTRATE JUDGE