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Attorney for Plaintiff

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

Paeng See,)	Case No. 1:24-cv-01516-GSA
Plaintiff,)	STIPULATION AND ORDER FOR
)	EXTENSION OF TIME
vs.)	
Michelle King, ACTING)	
COMMISSIONER OF SOCIAL)	
SECURITY ¹ ,)	
)	
Defendant.)	

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).

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

3 This is Plaintiff's first request for an extension of time. Plaintiff respectfully
4 states that the requested extension is necessary due several merit briefs being due
5 on the same week. For the weeks of March 10, 2025 and March 17, 2025,
6 Plaintiff's Counsel has fifteen Merit 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 4, 2025 PENA & BROMBERG, ATTORNEYS AT LAW

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

17
18 Dated: March 4, 2025 PHILLIP A. TALBERT
19 United States Attorney
20 MATHEW W. PILE
21 Associate General Counsel
22 Office of Program Litigation
23 Social Security Administration

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

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2
3 **ORDER**
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5 Pursuant to stipulation,
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7 IT IS SO ORDERED.
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9 Dated: **March 5, 2025**

/s/ Gary S. Austin
UNITED STATES MAGISTRATE JUDGE
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