

1 PHILLIP A. TALBERT
 Acting United States Attorney
 2 DEBORAH LEE STACHEL
 Regional Chief Counsel
 3 DANIEL P. TALBERT
 Special Assistant United States Attorney
 4 Social Security Administration
 160 Spear Street, Suite 800
 5 San Francisco, CA 94105
 Telephone: (510) 970-4860
 6 Facsimile: (415) 744-0134
 Attorneys for Defendant
 7
 8
 9

10 UNITED STATES DISTRICT COURT
 11 EASTERN DISTRICT OF CALIFORNIA
 12 SACRAMENTO DIVISION
 13

14 RICHARD RANIA,
 15 Plaintiff,
 16 v.
 17 ANDREW SAUL,
 Commissioner of Social Security,
 18 Defendant.
 19

No. 2:20-cv-01541-MCE-CKD

STIPULATION AND ORDER FOR
 EXTENSION TO FILE MOTION FOR
 SUMMARY JUDGMENT

20 IT IS HEREBY STIPULATED by and between the parties through their undersigned
 21 counsel, subject to the approval of the Court, that Defendant shall have an extension of 30 days to
 22 file his cross-motion for summary judgment, until July 8, 2021.

23 Because of extensions related to the COVID-19 pandemic and delayed production of
 24 certified administrative records throughout the country, the Social Security Administration has
 25 workload imbalances between various regions, requiring attorneys to provide assistance on cases
 26 in other regions. Currently the workload in the United States District Courts for the Eastern and
 27 Western Districts of Missouri is overwhelming the attorneys primarily responsible for briefing
 28 cases in those jurisdictions, even after obtaining multiple extensions. Therefore, other attorneys

1 have received reassignments from those districts that require immediate attention, with no further
2 extensions possible in many of those cases. The attorney responsible for briefing this case is one
3 of the attorneys who has received reassignment of urgent cases from those districts.

4 Because Defendant has not sought or received an extension for this brief, Defendant
5 requests a first extension of thirty days, with a new due date of July 8, 2021. This extension
6 would allow the Social Security Administration to balance its currently uneven workloads, give
7 attention to the longest-pending cases, and give complete and appropriate consideration to
8 briefing this case.

9 Respectfully submitted June 1, 2021.

10 DATED: June 1, 2021

11 /s/ David Chermol
12 DAVID CHERMOL
13 (as authorized by email)
14 Attorney for Plaintiff

13 PHILLIP A. TALBERT
14 Acting United States Attorney

15 DATED: June 1, 2021

16 By s/ Daniel P. Talbert
17 DANIEL P. TALBERT
18 Special Assistant United States Attorney

17 Attorneys for Defendant

18 ORDER

19 Pursuant to stipulation, it is so ordered.

20 Dated: June 4, 2021

21 
22 _____
23 CAROLYN K. DELANEY
24 UNITED STATES MAGISTRATE JUDGE

25
26
27
28