

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

JONATHAN O. PENA, ESQ.
CA Bar ID No. 278044
Peña & Bromberg, PLC
2440 Tulare St., Suite 320
Fresno, CA 93721
Telephone: 559-412-5390
Fax: 866-282-6709
info@jonathanpena.com
Attorney for Plaintiff

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

April Parker,

Plaintiff,

vs.

Kilolo Kijakazi, Acting
Commissioner of Social Security,

Defendant.

Case No. 2:21-cv-01972-AC

STIPULATION AND ~~PROPOSED~~
ORDER FOR EXTENSION OF
TIME

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
45-day extension of time, from August 15, 2022 to September 29, 2022, for
Plaintiff to serve on defendant with Plaintiff’s Motion 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.

In the months of May through July 21, 2022, Counsel has received an influx
of Social Security Certified Administrative Records (CAR) from the Eastern

1 District. A review of the records received shows Counsel has received at least 50
2 CARs, the majority of which were filed in June 2022.

3 Additionally, for the weeks of August 1, 2022 and August 8, 2022, Counsel
4 currently has 18 merit briefs, and several letter briefs and reply briefs. Additional
5 time is needed to thoroughly brief this matter for the Court.

6 Defendant does not oppose the requested extension. Counsel apologizes to
7 the Defendant and Court for any inconvenience this may cause.

8
9
10 Respectfully submitted,

11 Dated: July 22, 2022

PENA & BROMBERG, ATTORNEYS AT LAW

12
13 By: /s/ Jonathan Omar Pena
14 JONATHAN OMAR PENA
15 Attorneys for Plaintiff

16
17 Dated: July 25, 2022

18 PHILLIP A. TALBERT
19 United States Attorney
20 PETER K. THOMPSON
21 Acting Regional Chief Counsel, Region IX
22 Social Security Administration

23 By: */s/ Andrea Banks
24 Andrea Banks
25 Special Assistant United States Attorney
26 Attorneys for Defendant
27 (*As authorized by email on July 25, 2022)
28

PROPOSED ORDER

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Pursuant to stipulation, IT IS SO ORDERED.

Dated: August 2, 2022



ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE