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Attorney for Plaintiff
Carlos Chavez, Jr.

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

CARLOS CHAVEZ, JR.,

Plaintiff,

V.

COMMISSIONER OF
SOCIAL SECURITY,

Defendant,

Case No. 2:22-CV-00490-DMC

**STIPULATION AND ORDER, ON
PLAINTIFF'S REQUEST FOR
EXTENSION OF TIME TO FILE A
REPLY TO DEFENDANT'S MOTION
FOR SUMMARY JUDGMENT**

The parties stipulate through counsel that Plaintiff shall have a first extension of 15 days to file a reply in support of Plaintiff's Motion for Summary Judgment and in opposition to Defendant's Motion for Summary Judgment ("Motion") (ECF No. 15), extending the date on which Plaintiff's response is due from January 18, 2023, to February 2, 2023.

Plaintiff needs more time to respond to Defendant's Motion because the undersigned attorney for Plaintiff has returned to office after extenuating family/medical health issues and upon her return on January 2, 2023, she had three emergency hearings, including three trial briefs due for unrelated matters in the same two weeks in which the Defendant filed her Motion, prompting a deadline to file Plaintiff's reply brief by January 18, 2023.

The attorney for Plaintiff sincerely apologizes for any inconvenience to the Court, Defendant and opposing counsel. This request is made in good faith and is not intended to delay the proceedings in this matter. It was with utmost respect that consideration be given, as absent

those ex-parte hearings that Petitioner's attorney was ordered to appear at, this further complicated her ability to complete the reply brief as expected.

Respectfully submitted,

DATE: January 18, 2023

/s/ Jody Marie Peterson
JODY MARIE PETERSON
Attorney for Plaintiff

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

DATE: January 18, 2023

By /s/ Elizabeth Landgraf
ELIZABETH LANDGRAF
Special Assistant United States Attorney
Attorneys for Defendant
(as approved via email)

ORDER

Pursuant to the parties' stipulation, IT IS SO ORDERED that Plaintiff shall have an extension, up to and including February 2, 2023, to respond to Defendant's Motion for Summary Judgment.

Dated: January 19, 2023



DENNIS M. COTA
UNITED STATES MAGISTRATE JUDGE