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Attorney for Plaintiff
Carlos Chavez, Jr.

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

CARLOS CHAVEZ, JR.,

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

Plaintiff,

V.

COMMISSIONER OF
SOCIAL SECURITY,

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

Defendant,

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

1 those ex parte hearings that Petitioner's attorney was ordered to appear at, this further
2 complicated her ability to complete the reply brief as expected.
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4

5 Respectfully submitted,
6

7 DATE: January 18, 2023 */s/ Jody Marie Peterson*
8 JODY MARIE PETERSON
9 Attorney for Plaintiff

10 PHILLIP A. TALBERT
11 United States Attorney
12 MATHEW W. PILE
13 Associate General Counsel
14 Social Security Administration

15 DATE: January 18, 2023 By */s/ Elizabeth Landgraf*
16 ELIZABETH LANDGRAF
17 Special Assistant United States Attorney
18 Attorneys for Defendant
19 (as approved via email)

20
21 **ORDER**

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

25 Dated: January 19, 2023



26
27 DENNIS M. COTA
28 UNITED STATES MAGISTRATE JUDGE