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

RALPH DENNIS,
Plaintiff,
v.
KILOLO KIJAKAZI,
Acting Commissioner of Social Security,
Defendant.

Civil No. 2:22-cv-00759-AC

**STIPULATION AND [PROPOSED]
ORDER FOR EXTENSION OF TIME
TO RESPOND TO PLAINTIFF'S
COMPLAINT**

1 The parties stipulate through counsel that Defendant, the Acting Commissioner of Social Security
2 (the "Commissioner"), shall have an extension of time to respond to Plaintiff's Complaint in this case.

3 In support of this request, the Commissioner respectfully states as follows:

4 1. Defendant's response to Plaintiff's Complaint is due August 3, 2022. Defendant has not
5 previously requested an extension of this deadline.

6 2. The agency's Office of Appellate Operations (OAO) is responsible for preparation of
7 CARs. The Commissioner is in contact with OAO to ensure that the certified administrative record
8 (CAR) is being properly certified for filing. The CAR in this case has not yet been finalized by OAO for
9 filing. Accordingly, Defendant requests an extension of 60 days to respond to Plaintiff's Complaint.

10 3. Counsel for the Commissioner has consulted with Plaintiff's counsel who advised that he
11 has no objections.

12 4. This request is made in good faith and is not intended to delay the proceedings in this
13 matter.

14 WHEREFORE, Defendant requests an extension of 60 days until October 2, 2022, to respond to
15 Plaintiff's Complaint.

16 Respectfully submitted,

17 United Disability Lawyers Group

18 Date: August 2, 2022

19 By: s/ Betty Herrera *

20 Betty Herrera

21 (*as authorized by email)

22 *Authorized by email on August 2, 2022

23 Attorneys for Plaintiff

24 Date: August 2, 2022

25 PHILIP A. TALBERT

26 United States Attorney

27 Eastern District of California

28 By: /s/ Oscar Gonzalez de Llano

OSCAR GONZALEZ de LLANO

Special Assistant United States Attorney

Attorneys for Defendant

ORDER

APPROVED AND SO ORDERED

DATED: August 2, 2022



ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE

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