1	PHILLIP A. TALBERT		
	United States Attorney		
2	MATHEW W. PILE		
3	Associate General Counsel Office of Program Litigation, Office 7		
4	JULIE A.K. CUMMINGS, SBN HI 10635 Special Assistant United States Attorney		
5	Office of Program Litigation, Office 7		
	Office of the General Counsel		
6	Social Security Administration		
7	6401 Security Boulevard Baltimore, MD 21235		
8	Telephone: 410-966-1551		
	Email: Julie.Cummings@SSA.gov		
9	Attorneys for Defendant		
10			
12	UNITED STATES DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA SACRAMENTO DIVISION		
13			
14	SACKAIVILIN	TO DIVISION	
15			
16	MAX GOUVEIA,	Civil No. 2:23-cv-01442-JDP	
10			
17	Plaintiff,		
10		STIPULATION AND PROPOSED ORDER FOR	
18	VS.	EXTENSION OF TIME TO FILE DEFENDANT'S BRIEF	
19	COMMISSIONER OF SOCIAL SECURITY,	DEFENDANT S BRIEF	
• •	COMMISSIONER OF SOCIAL SECORITY,		
20	Defendant.		
21			
22			
23	Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the		
23			

parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment (ECF No. 7) be extended thirty (30) days from January 26, 2024, up to and including February 26, 2024. This is the Defendant's first request for an extension.

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STIPULATION AND PROPOSED ORDER FOR EXTENSION OF TIME TO FILE DEFENDANT'S BRIEF

1	As counsel for Defendant, I make this request in good faith and for good cause. I request	
2	this extension in order to further consider the 1881-page administrative record in light of the	
3	three issues raised in Plaintiff's motion. Additionally, I have had several briefs due in recent days	
4	in multiple district courts. In the next month, I have eight more briefs due in various district	
5	courts of the Ninth Circuit, including this one, and an oral argument. Accordingly, I ask the	
6	Court for more time so that I can properly represent the Commissioner in this and my other	
7	matters.	
8	The parties further stipulate that the Court's Scheduling Order shall be modified	
9	accordingly.	
10	DATED February 6, 2024	
12		Respectfully submitted,
13		PHILLIP A. TALBERT United States Attorney
14		MATHEW W. PILE
15		Associate General Counsel
16		Office of Program Litigation, Office 7
17	By:	/s/ Julie A.K. Cummings
18		JULIE A.K. CUMMINGS
19		Special Assistant United States Attorney Office of Program Litigation, Office 7
20		
21		Attorneys for Defendant
22		Law Office of Jared T. Walker, PC
23		<u>/s/ Jared Thomas Walker</u> JARED THOMAS WALKER
		(by email authorization)
24		Attorney for Plaintiff
25		
26		
27		
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STIPULATION AND  $\overline{\text{PROPOSED}}$  ORDER FOR EXTENSION OF TIME TO FILE DEFENDANT'S BRIEF

## **ORDER** Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an extension, up to and including February 26, 2024, to respond to Plaintiff's Motion for Summary Judgment. IT IS SO ORDERED. Dated: February 6, 2024 UNITED STATES MAGISTRATE JUDGE