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9 Attorneys for Defendant

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 12 UNITED STATES DISTRICT COURT
 EASTERN DISTRICT OF CALIFORNIA
 13 SACRAMENTO DIVISION

14
 15 RHONDA JEAN CROCKER,

16 Plaintiff,

17 vs.

18 COMMISSIONER OF SOCIAL SECURITY,

19 Defendant.

Civil No. 2:23-cv-02132-DMC

STIPULATION AND ORDER
 FOR AN EXTENSION OF TIME

20
 21 IT IS HEREBY STIPULATED by the parties, through their counsels, that Defendant, the
 22 Commissioner of Social Security, shall have a 30-day extension of time, to July 5, 2024, of the
 23 deadline to file Defendant’s Brief. This is Defendant’s first request for an extension of the time
 24 to file its response to Plaintiff’s Motion for Summary Judgment.

25
 26 There is good cause for this extension. Defendant respectfully requests this additional
 27 time because Defendant’s counsel is experiencing an extremely heavy workload, despite due

1 diligence. In addition to this case, the undersigned is preparing the Commissioner's response
2 briefs for multiple district court cases with concurrent deadlines. Plus, the undersigned is
3 assigned to train and review the briefing prepared by an attorney recently hired by this counsel's
4 office. This case is being used as a case for such training. An additional thirty days would
5 provide the undersigned with the time to thoroughly review the newly-hired attorney's draft brief
6 before filing. For this reason, Defendant's counsel requires additional time to properly address
7 the issues raised in Plaintiff's Opening Brief. This request is made in good faith and with no
8 intention to unduly delay the proceedings. Defendant appreciates Plaintiff's counsel's
9 professional courtesy and apologizes to the Court for the inconvenience.
10

11 It is therefore requested that Defendant be granted an extension of time to respond to
12 Plaintiff's Opening Brief, through and including July 5, 2024.

13
14 DATED: May 30, 2024

Respectfully submitted,

/s/ Jacqueline A. Forslund

(*as authorized via e-mail on May 30, 2024)

JACQUELINE A. FORSLUND

Attorney for Plaintiff

15
16
17 DATED: May 30, 2024

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Senior Trial Attorney, Civil Division

By: /s/ Marla Latellier

MARLA LATELLIER

Special Assistant United States Attorney

Attorneys for Defendant

ORDER

Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an extension, up to and including July 5, 2024, to respond to Plaintiff's Motion for Summary Judgment.

Dated: June 3, 2024



DENNIS M. COTA
UNITED STATES MAGISTRATE JUDGE

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