

1 PHILLIP A. TALBERT
 United States Attorney
 2 MATHEW W. PILE
 Associate General Counsel
 Office of Program Litigation, Office 7
 3 CASPAR CHAN, CSBN 294804
 Special Assistant United States Attorney
 4 Social Security Administration
 5 6401 Security Boulevard
 6 Baltimore, MD 21235
 7 Telephone: 510-970-4810
 8 Facsimile: 415-744-0134
 Email: Caspar.Chan@ssa.gov

9 Attorneys for Defendant

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

13 YVONNE SKIDGEL,

14 Plaintiff,

15 v.

16 COMMISSIONER OF SOCIAL SECURITY,

17 Defendant.
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) Civil No. 2:23-cv-02179-KJM-EFB

) **STIPULATION AND ORDER TO EXTEND**
) **BRIEFING SCHEDULE**

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1 The parties stipulate through counsel that Defendant, the Commissioner of Social Security (the
2 “Commissioner”), shall have an extension of 30 days to respond to Plaintiff’s Motion for Summary
3 Judgment in this case. In support of this request, the Commissioner respectfully states as follows:

4 1. The Commissioner’s response to Plaintiff’s Motion for Summary Judgment is due March
5 29, 2024. Defendant has not previously received an extension of this deadline.

6 2. Plaintiff has raised an argument regarding the longstanding principle of *Chevron*
7 deference based on a pair of cases pending before the United States Supreme Court. Because *Chevron*
8 deference is fundamental to the Social Security disability framework, Counsel for the Commissioner is
9 in the process of consulting with management and senior attorneys within the agency regarding the
10 defensibility of this issue, as well as any response as appropriate.

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

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

15 WHEREFORE, Defendant requests until April 28, 2024, to respond to Plaintiff’s Motion for
16 Summary Judgment.

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18 Date: March 28, 2024

PRATO & REICHMAN, APC

19 By: /s/ Caspar Chan for Justin Prato*
20 JUSTIN PRATO

*Authorized by email on March 28, 2024
Attorneys for Plaintiff

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Date: March 28, 2024

PHILIP A. TALBERT
United States Attorney
Eastern District of California

By: /s/ Caspar Chan
CASPAR CHAN
Special Assistant United States Attorney
Attorneys for Defendant

ORDER

APPROVED AND SO ORDERED.

Dated: March 28, 2024


EDMUND F. BRENNAN
UNITED STATES MAGISTRATE JUDGE