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10 **UNITED STATES DISTRICT COURT**
 11 **EASTERN DISTRICT OF CALIFORNIA**
 12 **SACRAMENTO DIVISION**

13 SALVADOR ZAVALA,
 14 Plaintiff,
 15 v.
 16 COMMISSIONER OF SOCIAL SECURITY,
 17 Defendant.
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Civil No. 2:24-cv-00103-DMC

20 **STIPULATION AND ORDER TO EXTEND**
 21 **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 May 6,
5 2024. Defendant has not previously received an extension of this deadline.

6 2. Counsel for the Commissioner is in the process of discussing the defensibility of this
7 matter with his client. Counsel for the Commissioner believes that this short extension may resolve this
8 matter without necessitating this Court to address the merits of this matter. Moreover, this brief extension
9 would conserve judicial time and resources should the Parties be able to resolve this matter.

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 unnecessarily delay the
13 proceedings in this matter.

14 WHEREFORE, Defendant requests until June 5, 2024, respond to Plaintiff’s Motion for
15 Summary Judgment.

16
17 Date: May 8, 2024

KELLY, DUARTE, URSTOEGER & RUBLE, LLP

18 By: /s/ Caspar Chan for Jeffrey R. Duarte *
19 JEFFREY R. DUARTE
20 *Authorized by email on May 8, 2024
21 Attorneys for Plaintiff

22 Date: May 8, 2024

PHILIP A. TALBERT
United States Attorney
Eastern District of California

23
24 By: /s/ Caspar Chan
25 CASPAR CHAN
26 Special Assistant United States Attorney
27 Attorneys for Defendant
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ORDER

APPROVED AND SO ORDERED

Dated: May 8, 2024

A handwritten signature in dark ink, appearing to read 'Dennis M. Cota', written over a horizontal line.

DENNIS M. COTA
UNITED STATES MAGISTRATE JUDGE

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