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

12 RAYMOND DANIEL GREEN,)	Case No.: 2:24-cv-01381-DMC
13 Plaintiff,)	STIPULATION AND ORDER FOR AN
14 vs.)	EXTENSION OF TIME
15 MARTIN O'MALLEY,)	
16 Commissioner of Social Security,)	
17 Defendant.)	

19 Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the
 20 parties, through their respective counsel of record, that the time for Defendant to respond to
 21 Plaintiff's Motion for Summary Judgment be extended thirty-three (33) days from September 12,
 22 2024, up to and including October 15, 2024. This is the Defendant's first extension request.

23 Defendant requests this extension in order to review the record; evaluate the issues raised
 24 in Plaintiff's brief; determine whether options exist for settlement; and if not, to prepare
 25 Defendant's response to Plaintiff's motion. Defendant's counsel was recently assigned this case
 26 along with several other cases, and now has five cases due in the week of September 12, 2024.
 27 Defendant's counsel will endeavor to complete these tasks as soon as possible. This request is
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1 made in good faith and with no intention to unduly delay the proceedings, and counsel
2 apologizes for any inconvenience.

3 The parties further stipulate that the Court's Scheduling Order shall be modified
4 accordingly.

5 Respectfully submitted,

6 LAW OFFICES OF FRANCESCO BENAVIDES

7 Dated: August 29, 2024

/s/ Francesco Paulo Benavides*
8 (*as authorized via e-mail)
9 FRANCESCO PAULO BENAVIDES
Attorney for Plaintiff

10 Dated: August 29, 2024

11 PHILLIP A. TALBERT
United States Attorney
12 MATHEW W. PILE
Associate General Counsel
13 Social Security Administration

14 By: /s/ Michelle A. Pavelek
15 MICHELLE A. PAVELEK
Special Assistant U.S. Attorney
16 Attorneys for Defendant

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18 **ORDER**

19 Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an
20 extension, up to and including October 15, 2024, to respond to Plaintiff's Brief and Plaintiff's
21 optional reply brief will be extended to October 29, 2024.

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23 Dated: August 29, 2024

24 
25 DENNIS M. COTA
26 UNITED STATES MAGISTRATE JUDGE
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