1	PHILLIP A. TALBERT		
2	United States Attorney MATHEW W. PILE		
3	Associate General Counsel Office of Program Litigation, Office 7 Oscar Gonzalez de Llano Special Assistant United States Attorney Social Security Administration Office of General Counsel 6401 Security Boulevard Baltimore, MD 21235 Telephone: (510) 970-4818 Email: Oscar.Gonzalez@ssa.gov Attorneys for Defendant		
4			
5			
6			
7			
8			
9			
10			
11	UNITED STATES DISTRICT COURT		
12	EASTERN DISTRICT OF CALIFORNIA		
13	EASTERN DISTRICT OF CALIFORNIA		
14	VINCENT BERNARD DAVIS,	No. 2:24-cv-01874-CKD	
15	Plaintiff,		
16	V.	STIPULATED MOTION AND ORDER FOR AN EXTENSION OF TIME TO RESPOND TO	
17	MARTIN O'MALLEY,	PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT	
18	Commissioner of Social Security,  Defendant.		
19	Defendant.		
20			
21	IT IS HEREBY STIPULATED, by and between the parties through their respective		
22	counsel of record, with the Court's approval, that Defendant's time for responding to Plaintiff's		
23	Motion for Summary Judgment be extended fourteen (14) days from November 22, 2024 to		
24	December 6, 2024. This is Defendant's second request for an extension. Counsel for Plaintiff		
25	has no objection to Defendant's request for an extension.		
26	Good cause exists for this request. Defendant respectfully requests this additional time		
27	because Counsel for Defendant has and will be unable to devote the time required to complete its		
28			

1	response. Counsel has multiple merit briefs currently due in district court cases within the next		
2	week. Counsel for Defendant was out of the office the past couple days providing care for his		
3	child that is out sick and Counsel will also be out of the office on November 26-29, 2024. Given		
4	competing workload requirements and pending travel an extension until December 6, 2024 will		
5	provide the opportunity for the undersigned Counsel for Defendant to prioritize completing the		
6	response to Plaintiff's Motion for Summary Judgment. The undersigned Counsel apologizes to		
7	the Court and Plaintiff's counsel for any inconvenience caused by this request and delay. All		
8	other dates in the Court's Scheduling Order shall be extended accordingly.		
9			
10		Respectfully submitted,	
11		PHILLIP A. TALBERT United States Attorney	
12	DATE N	ž	
13	DATE: November 22, 2024 By:	OSCAR GONZALEZ DE LLANO	
14		Special Assistant United States Attorney Attorneys for Defendant	
15			
16		Respectfully submitted,	
17		Law Offices of Lawrence D. Rohlfing, Inc., CPC	
18	DATE: November 22, 2024 By:	Steven Gilbert Rosales	
19		(*as authorized by email) Attorney for Plaintiff	
20			
21			
22			
23			
24			
25			
26			
27			
28			

ORDER IT IS ORDERED that Defendant's stipulated motion for extension of time (ECF No. 14) is GRANTED. Defendant shall have an extension, up to and including December 6, 2024, to respond to Plaintiff's Motion for Summary Judgment. Dated: November 26, 2024 UNITED STATES MAGISTRATE JUDGE