

1 PHILLIP A. TALBERT  
 United States Attorney  
 2 MATHEW W. PILE, WSBA No. 32245.  
 Associate General Counsel  
 3 Office of Program Litigation, Office 7  
 Social Security Administration  
 4 MARCELO ILLARMO (MABN 670079)  
 Special Assistant United States Attorney  
 5 Office of the General Counsel  
 Social Security Administration  
 6 6401 Security Boulevard  
 7 Baltimore, Maryland 21235  
 Telephone: (510) 970-4822  
 8 E-Mail: Marcelo.Illarmo@ssa.gov  
 9 Attorneys for Defendant

11 UNITED STATES DISTRICT COURT  
 12 EASTERN DISTRICT OF CALIFORNIA

No. 2:24-cv-02583-JDP

14 JACKLIN DANIEL,  
 15 Plaintiff,

16 v.

17 COMMISSIONER OF SOCIAL  
 18 SECURITY,

Defendant.

STIPULATION FOR EXTENSION TO FILE  
 OPPOSITION TO PLAINTIFF’S OPENING  
 BRIEF

20 IT IS HEREBY STIPULATED, by and between the parties, through their respective  
 21 counsel of record, that the time for responding to Plaintiff’s motion for summary judgment be  
 22 extended from January 23, 2025 to February 24, 2025. This is Defendant’s first request for an  
 23 extension of time to respond to Plaintiff’s brief. Defendant respectfully requests this additional  
 24 time because counsel has experienced a death in the family and will be travelling home to Guam  
 25 for an as of yet unspecified amount of time.

26 The parties further stipulate that the Court’s Scheduling Order shall be modified  
 27 accordingly.

- 28 • Defendant shall respond to Plaintiff’s opening brief on or before February 24, 2025;

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- Plaintiff's optional reply will be due within 14 days of the filing of Defendant's brief (on or before March 10, 2025).

Respectfully submitted,

DATE: January 7, 2025

*/s/ Francesco Paulo Benavides \**  
FRANCESCO PAULO BENAVIDES  
Attorney for Plaintiff  
(\* approved via email on 1/7/25)

PHILLIP A. TALBERT  
United States Attorney


DATE: January 7, 2025

By *s/ Marcelo Illarmo*  
MARCELO ILLARMO  
Special Assistant United States Attorney  
  
Attorneys for Defendant

ORDER

IT IS SO ORDERED.

Dated: January 8, 2025

  
\_\_\_\_\_  
JEREMY D. PETERSON  
UNITED STATES MAGISTRATE JUDGE