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 9 Attorney for Plaintiff

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

12 Candy Jean Santos ,  
 13 Plaintiff,

14 vs.

15 Michelle King, ACTING  
 16 COMMISSIONER OF SOCIAL  
 17 SECURITY<sup>1</sup>,

18 Defendant.

Case No. 2:24-cv-3061-JDP

STIPULATION AND ~~PROPOSED~~  
 ORDER FOR EXTENSION OF  
 TIME

19 \_\_\_\_\_  
 20  
 21 Pending the Court’s approval, IT IS HEREBY STIPULATED, by and  
 22 between the parties through their respective counsel of record, with the Court’s  
 23 approval, that Plaintiff shall have a 60-day extension of time, from March 7, 2025  
 24 to May 6, 2025, for Plaintiff to serve on defendant with PLAINTIFF’S MOTION

25 \_\_\_\_\_  
 26 1 Michelle King became the Acting Commissioner of Social Security on January  
 27 23, 2025. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Michelle  
 28 King should be substituted for Carolyn Colvin as the defendant in this suit. No  
 further action need be taken to continue this suit by reason of the last sentence of  
 section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 FOR SUMMARY JUDGMENT. All other dates in the Court's Scheduling Order  
2 shall be extended accordingly.

3 This is Plaintiff's first request for an extension of time. Plaintiff respectfully  
4 states that the requested extension is necessary due several merit briefs being due  
5 on the same week. For the weeks of March 3 ,2025 and March 10, 2025 Plaintiff's  
6 Counsel has thirteen merit briefs due. Counsel requires additional time to brief the  
7 issues thoroughly for the Court's consideration. Defendant does not oppose the  
8 requested extension. Counsel apologizes to the Defendant and Court for any  
9 inconvenience this may cause.

10  
11 Respectfully submitted,

12 Dated: February 28, 2025 PENA & BROMBERG, ATTORNEYS AT LAW

13  
14 By: /s/ Jonathan Omar Pena  
15 JONATHAN OMAR PENA  
16 Attorneys for Plaintiff

17  
18 Dated: February 28, 2025 PHILLIP A. TALBERT  
19 United States Attorney  
20 MATHEW W. PILE  
21 Associate General Counsel  
22 Office of Program Litigation  
23 Social Security Administration

24 By: \*/s/ Justin Lane Martin  
25 Justin Lane Martin  
26 Special Assistant United States Attorney  
27 Attorneys for Defendant  
28 (\*As authorized by email on February 28, 2025)

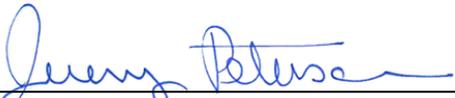
**PROPOSED ORDER**

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Pursuant to stipulation,

IT IS SO ORDERED.

Dated: March 4, 2025

  
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JEREMY D. PETERSON  
UNITED STATES MAGISTRATE JUDGE