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 10 UNITED STATES DISTRICT COURT
 12 EASTERN DISTRICT OF CALIFORNIA
 13 SACRAMENTO DIVISION

14 DAJUANA BANKS,

Civil No. 2:24-cv-03237-DMC

15 Plaintiff,

16 STIPULATION AND ORDER FOR
 EXTENSION OF TIME TO FILE THE
 17 ELECTRONIC CERTIFIED
 ADMINISTRATIVE RECORD AS THE
 18 ANSWER TO PLAINTIFF’S COMPLAINT

19 vs.

20 COMMISSIONER OF SOCIAL SECURITY,

21 Defendant.

22
 23 Pending the Court’s approval, the parties stipulate through their respective counsel that
 24 Defendant, the Commissioner of Social Security (the “Commissioner”), shall have a forty-five-
 25 day extension of time to respond to Plaintiff’s Complaint in this case from January 27, 2025, up to
 26 and including March 13, 2025. In support of this request, the Commissioner respectfully states as
 27 follows:

- 28 1. Defendant’s response to Plaintiff’s Complaint is due to be filed by January 27, 2025.

1 Defendant has not previously requested an extension of this deadline.

- 2 2. In accordance with the Federal Rules of Civil Procedures, recently amended to add
3 Supplemental Rules for Social Security review cases under 42 U.S.C. § 405(g), the
4 Commissioner files a certified administrative record (CAR) as the Answer to a
5 Complaint for review.
6
7 3. Counsel for the Commissioner has been informed by the client agency, which is the
8 Social Security Administration, Office of Appellate Operations, that the CAR is not
9 fully prepared in this matter. The client agency therefore needs more time to prepare
10 the CAR for the Court's review.
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12 4. For this reason, Defendant requests an extension to March 13, 2025 (45 days), to file
13 an Answer or other response in this matter.
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15 5. Counsel for the Commissioner has consulted with Plaintiff's counsel who advised that
16 she has no objection to this extension request.
17
18 6. This request is made in good faith and is not intended to delay the proceedings in this
19 matter.
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21 7. I am attempting to preserve limited judicial resources and have applied the most rapid
22 response under the circumstances.

23 WHEREFORE, Defendant requests until March 13, 2025, to respond to Plaintiff's
24 Complaint.

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DATE: January 27, 2025

Respectfully submitted,

Law Office of Geri N. Kahn

/s/ Geri Nadine Kahn*

GERI NADINE KAHN

Attorney for Plaintiff

(*as authorized via email on January 23, 2025)

MICHELE BECKWITH

Acting United States Attorney

MATHEW W. PILE

Associate General Counsel

Office of Program Litigation, Office 7

Social Security Administration

DATE: January 27, 2025

By s/ Justin L. Martin

JUSTIN L. MARTIN

Special Assistant United States Attorney

Attorneys for Defendant

ORDER

Pursuant to stipulation, it is so ordered.

Dated: January 27, 2025



DENNIS M. COTA

UNITED STATES MAGISTRATE JUDGE