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10 **UNITED STATES DISTRICT COURT**
 11 **EASTERN DISTRICT OF CALIFORNIA**
 12 **SACRAMENTO DIVISION**

14	JUAN RAMON AGUILAR,)	Case No.: 2:24-cv-03238-WBS-JDP
15	Plaintiff,)	STIPULATION AND PROPOSED ORDER
16	vs.)	FOR AN EXTENSION OF TIME
17	COMMISSIONER OF SOCIAL SECURITY,)	
18	Defendant.)	
19)	

20
 21 Pending the Court’s approval, the parties hereby stipulate that the time for Defendant to
 22 respond to Plaintiff’s Motion for Summary Judgment be extended thirty-five (35) days from
 23 March 24, 2025, up to and including April 28, 2025. Plaintiff’s reply would be due May 12,
 24 2025.

25 This is Defendant’s first request for an extension, and it is made with good cause. This
 26 case was recently reassigned to undersigned counsel for Defendant and counsel already has
 27 another brief due that day and several other briefs due by late April, along with other litigation
 28 matters. Thus, Defendant requires an extension in this case, and may require extensions in other

1 cases, and requests this extension in good faith and with no intent to delay these proceedings
2 unnecessarily.

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

5 Respectfully submitted,

6 Dated: March 7, 2025

/s/ Barbara M. Rizzo*
(*as authorized via e-mail on March 4, 2025)
BARBARA M. RIZZO
Attorney for Plaintiff

9 Dated: March 7, 2025

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14 By: /s/ Mary Tsai
MARY TSAI
Special Assistant U.S. Attorney
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17 Attorneys for Defendant

18 **ORDER**

19 Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an
20 extension, up to and including April 28, 2025, to respond to Plaintiff's Motion for Summary
21 Judgment. Plaintiff's reply is now due May 12, 2025.

22 IT IS SO ORDERED.

24 Dated: March 7, 2025


JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE