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Attorney for Plaintiff
JASON W. KELLER

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA
(Sacramento Division)

JASON W. KELLER,

Plaintiff,

v.

FRANK BISIGNANO, COMMISSIONER OF
SOCIAL SECURITY,

Defendants.

Case No. 2:25-cv-01744-AC

~~PROPOSED~~ ORDER AND
STIPULATION EXTENDING TIME

Subject to the approval and any further orders of the Court, the parties, by and through counsel of record, stipulate and agree that the Scheduling Order [ECF No. 5] should be modified and that good cause supports the extension of time.

Plaintiff's time to file an opening brief/motion for summary judgment should be extended 21 days from **January 5, 2026**, to **January 26, 2026**, all other deadlines to be determined by reference to the Court's scheduling order and the Supplemental Rules for Social Security Actions under 42 U.S.C. § 405(g) order.

The administrative record was filed August 20, 2025 [ECF No. 10].

This is Plaintiff's fourth request to extend time and modify the Scheduling Order. Good cause supporting the extension of the filing deadline includes that Plaintiff's counsel has been unable to

1 complete a draft of Plaintiff's opening brief to the professional standards of the Court despite
2 diligence due to the length of the administrative record and errors discovered in the draft motion, and
3 that in another matter counsel had an opening brief struck putting unanticipated demands on
4 counsel's time and interfering with his ability to complete briefing here.

5 This request is made by Plaintiff in good faith, without dilatory motive, and not for purposes
6 of undue delay or to prejudice the interest of any party.

7 SO STIPULATED AND AGREED, January 8, 2026:

8 FOR PLAINTIFF:

9 WEEMS LAW OFFICES

FOR DEFENDANT:

ERIC GRANT,
United States Attorney
MATTHEW PILE
Associate General Counsel
Office of the General Counsel, SSA
Office of Program Litigation, Office 7
CHRISTOPHER VIEIRA
Special Assistant United States Attorney

14 /s/Robert C. Weems

By:

14 /s/Christopher Vieira

15 Robert C. Weems,
16 Attorney for Plaintiff

CHRISTOPHER VIEIRA,
Special Assistant United States Attorney
and Attorney for the Defendant
(per email authorization)

18
19 DATED: January 8, 2026


ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE