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UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

TRENT PATTERSON, Plaintiff, vs. Commissioner of Social Security, Defendant.	Case No.: 2:25-cv-01975-EFB (SS) STIPULATION AND ~~[PROPOSED]~~ ORDER FOR AN EXTENSION OF TIME

Pending the Court's approval, IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Summary Judgment be extended thirty (30) days from November 10, 2025, up to and including December 15, 2025. This is Defendant's first request for an extension.

At the end of the day on September 30, 2025, the appropriations that have been funding the Department of Justice expired and appropriations to the Department lapsed. The same is true for most Executive agencies, including federal defendant Social Security Administration (SSA). It is not clear when funding will be restored by Congress.

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

In the absence of either a Fiscal Year 2026 appropriation or a continuing resolution to continue the ongoing operations of the SSA, no further financial obligations may be incurred by SSA, except for that work which, as defined by law, is excepted from the limitations of Anti-Deficiency Act (ADA). See 31 U.S.C. §§ 1341–1342.

Effective Monday, October 20, 2025, the Social Security Administration has determined that undersigned counsel and colleagues within her office may perform work on Social Security cases arising under 42 U.S.C. § 405(g) during the current lapse in appropriations as excepted work.

Although the undersigned counsel is permitted to work on Social Security cases arising under 42 U.S.C. § 405(g) as of October 20, 2025, undersigned counsel has many pressing deadlines resulting from the lapse in funding.

Undersigned counsel therefore requests an extension of time for 30 days.

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

Respectfully submitted,

Dated: November 3, 2025

/s/ *Francesco Benavides**
(*as authorized via e-mail on November 10, 2025)
FRANCESCO BENAVIDES
Attorney for Plaintiff

Dated: November 3, 2025

ERIC GRANT
United States Attorney
MATHEW W. PILE
Head of Program Litigation 1
Social Security Administration

By: /s/ *Erin Jurrens*
ERIN JURRENS
Special Assistant U.S. Attorney

Attorneys for Defendant

ORDER

Pursuant to the parties' stipulation, IT IS SO ORDERED that Defendant shall have an extension, up to and including December 15, 2025, to respond to Plaintiff's Motion for Summary Judgment.

DATED: November 10, 2025

EDMUND F. BRENNAN
UNITED STATES MAGISTRATE JUDGE