ERIC GRANT
United States Attorney
MATHEW W. PILE, WSBN 32245
Head of Program Litigation 1
Oscar Gonzalez de Llano
Special Assistant United States Attorney
Social Security Administration
Program Litigation 1
Law & Policy
6401 Security Boulevard
Baltimore, MD 21235
Telephone: (510) 970-4818
Email: Oscar.Gonzalez@ssa.gov
Attorneys for Defendant

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

KIRILL S. DUSHECHKIN, Plaintiff, v. COMMISSIONER OF SOCIAL SECURITY, Defendant.	Civil No. 2:25-cv-03301-DMC **STIPULATION AND ORDER FOR EXTENSION OF TIME TO RESPOND TO PLAINTIFF'S COMPLAINT**

The parties stipulate through counsel that Defendant, the Commissioner of Social Security (the "Commissioner"), shall have an extension of time to respond to Plaintiff's Complaint in this case. In support of this request, the Commissioner respectfully states as follows:

1. Defendant's response to Plaintiff's Complaint is due currently January 16, 2026. Defendant has not previously requested an extension of this deadline.

2. At the end of the day on September 30, 2025, the appropriations that were funding the Department of Justice expired and appropriations to the Department lapsed. The same was true for most Executive agencies, including federal defendant Social Security Administration (SSA). Funding was restored by Congress on November 12, 2025.

3. Although the undersigned counsel and all staff are back working on Social Security cases as of November 13, 2025, the undesigned counsel has many remaining backlogs regarding obtaining

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

electronic certified administrative records (eCARs). We have been working with our previously furloughed staff in order to work through the backlog yet given staffing shortages due to the recent holidays this eCAR is not available for filing by its current due date.

4. Given this situation Defendant requests an extension of 31 days to respond to Plaintiff's Complaint.

5. Counsel for the Commissioner has consulted with Plaintiff's counsel who advised that they have no objections.

6. This request is made in good faith and is not intended to delay the proceedings in this matter.

WHEREFORE, Defendant requests until February 16, 2026, respond to Plaintiff's Complaint.

Respectfully submitted,

Date: *January 14, 2026*

ERIC GRANT
United States Attorney
MATHEW W. PILE
Head of Program Litigation 1
By: *s/ Oscar Gonzalez de Llano*
OSCAR GONZALEZ de LLANO
Special Assistant United States Attorney
Attorneys for Defendant

Date: *January 14, 2026*

By: *s/ Lawrence David Rohlfing*
Lawrence David Rohlfing
Law Offices of Lawrence D. Rohlfing
Attorney for Plaintiff
(*as authorized by email)

ORDER

APPROVED AND SO ORDERED

Dated: January 14, 2026

DENNIS M. COTA
UNITED STATES MAGISTRATE JUDGE