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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

GUY MACRAE SEATON,

Plaintiff,

v.

COMMISSIONER OF SOCIAL SECURITY,

Defendant.

Civil No. 2:25-cv-03390-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 30, 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 undersigned counsel has many remaining backlogs regarding obtaining

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

4
5 4. Furthermore, for the past two months, we have had a major backlog in obtaining
6 transcriptions of hearing recordings throughout all of the Division of Civil Actions – our transcription
7 contractors are at capacity and have not been able to keep up with our requests.

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

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

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

14 WHEREFORE, Defendant requests until March 2, 2026, respond to Plaintiff's Complaint.

15 Respectfully submitted,

16
17 Date: January 28, 2026

ERIC GRANT
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By: s/ Oscar Gonzalez de Llano
OSCAR GONZALEZ de LLANO
Special Assistant United States Attorney
Attorneys for Defendant

22
23 Date: January 28, 2026

By: s/ Andrea L. Banks
Andrea L. Banks
Law Office of Andrea Banks
Attorney for Plaintiff
(*as authorized by email)

ORDER

APPROVED AND SO ORDERED.

Dated: January 28, 2026

A handwritten signature in dark ink, appearing to read 'Dennis M. Cota', written over a horizontal line.

DENNIS M. COTA
UNITED STATES MAGISTRATE JUDGE