ERIC GRANT
United States Attorney
MATHEW W. PILE, WSBN 32245
Head of Program Litigation 1
Law & Policy
Social Security Administration
ERIN A. JURRENS, MO 61402
Special Assistant United States Attorney
Program Litigation 1
Law & Policy
Social Security Administration
6401 Security Boulevard
Baltimore, MD 21235-6401
Telephone: (877) 833-2445
E-Mail: Erin.Jurrens@ssa.gov
Attorneys for Defendant

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

JULIE ANN RAMOS, Plaintiff, vs. Commissioner of Social Security, Defendant.	Case No.: 2:26-cv-00233-AC 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 sixty (60) days up to and including July 31, 2026. This is Defendant's first request for an extension.

Defendant requests this extension to further consider the administrative record given the issues raised in Plaintiff's motion. The undersigned currently has 27 assigned cases as well as planned leave and responsibility for handling fee matters. Thus, it would be disingenuous for the undersigned to assert that she could adequately respond to Plaintiff's arguments without the requested extension of time.

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

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

Respectfully submitted,

Dated: May 26, 2026

/s/ *Francesco Benavides**
*as authorized by e-mail
FRANCESCO BENAVIDES
Attorney for Plaintiff

Dated: May 26, 2026

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 July 31, 2026, to respond to Plaintiff's Motion for Summary Judgment.

DATED: May 26, 2026

ALLISON CLAIRE
UNITED STATES MAGISTRATE JUDGE