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Attorney for Plaintiff
ANGELA MONIQUE BARNEY

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

SACRAMENTO DIVISION

ANGELA MONIQUE BARNEY, Plaintiff, v. FRANK BISIGNANO, Commissioner of Social Security, Defendant.	Case No. 2:26-cv-00484-JDP STIPULATION AND ~~[PROPOSED]~~ ORDER FOR EXTENSION OF TIME TO FILE PLAINTIFF'S MOTION FOR SUMMARY JUDGMENT

IT IS HEREBY STIPULATED by and between the parties through their undersigned counsel, subject to the approval of the Court, that Plaintiff shall have an extension of time of 45 days to file his motion for summary judgment. Plaintiff's motion for summary judgment is currently due to be filed on April 30, 2026. If the 45-day extension is approved by this Court, Plaintiff's motion for summary judgment will be due June 14, 2026.

There is good cause for the extension. Plaintiff's counsel has 12 opening briefs and 4 reply briefs due to be filed on or before April 29, 2026. The extension of time will permit Plaintiff's counsel sufficient time and resources to conduct a thorough review of the record and draft the issues most pertinent to the Court's judicial review of this case.

AUTHENTICATED U.S. GOVERNMENT INFORMATION GPO

Respectfully submitted,

Dated: April 25, 2026

Law Offices of Francesco Benavides

By: */s/ Francesco Benavides*
FRANCESCO P. BENAVIDES
Attorney for Plaintiff

Dated: April 25, 2026

ERIC GRANT
United States Attorney
MATHEW W. PILE
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By: *Roseanne Gillette**
ROSEANNE GILLETTE
Special Assistant U.S. Attorney
Attorneys for Defendant
(*Permission to use electronic signature obtained via email on April 25, 2026).

~~[PROPOSED]~~ ORDER

IT IS HEREBY ORDERED, based on the stipulation of the parties, and for good cause shown, that Plaintiff is granted a 45-day extension of time to file her motion for summary judgment in the above-captioned case. With the extension, Plaintiff's motion for summary judgment is now due on June 14, 2026.

IT IS SO ORDERED.

Dated: April 29, 2026

JEREMY D. PETERSON
UNITED STATES MAGISTRATE JUDGE