

1 Melissa Newel (#148563)
2 NEWEL LAW
3 2625 Alcatraz Ave., Suite 132
4 Berkeley, CA 94705
5 (510) 316-3827
6 mnewel@newellawfirm.com

7
8 Attorney for Plaintiff
9 JERRY ANDRADE

10
11 UNITED STATES DISTRICT COURT
12 EASTERN DISTRICT OF CALIFORNIA

13 JERRY ANDRADE,

14 Plaintiff,

15 v.

16 COMMISSIONER OF
17 SOCIAL SECURITY,

18 Defendant.

No. 1:25-CV-001184 (BAM)

**STIPULATION FOR BRIEFING
EXTENSION; [~~PROPOSED~~] ORDER**

19
20
21
22 On September 12, 2025, Plaintiff Jerry Andrade filed the instant civil action for judicial
23 review of the defendant Commissioner of Social Security's decision denying his application for
24 Social Security disability insurance benefits under Title II of the Social Security Act. (ECF Doc.
25 1) The Defendant responded to Plaintiff's Complaint on November 13, 2023. (ECF Doc. 10)
26 Pursuant to the Court's Scheduling Order, Plaintiff's motion for summary judgment is currently
27 due to be filed no later than December 15, 2025. (ECF Doc. 5 at p.2:17-18)
28

1 Plaintiff requests an extension of thirty (30) days to file his motion. *Id.* at p.3:17-18. This
2 is Plaintiff's first request for an extension of time. Plaintiff's counsel seeks the extension to
3 effectively advocate for Plaintiff as counsel did not represent Mr. Andrade at the administrative
4 level and the record contains nearly 1,000 pages of medical evidence. *See, Costa v. Comm'r of*
5 *Soc. Sec. Admin.*, 690 F.3d 1132, 1134 n. 1 (9th Cir. 2012) [noting "social security disability cases
6 are often highly fact-intensive and require careful review of the administrative record, including
7 complex medical evidence."]. Plaintiff's counsel apologizes to the Court for any inconvenience.
8 The defendant has no objection to the requested extension.

9
10 Respectfully submitted,

11 Dated: December 10, 2025

NEWEL LAW

By: Melissa Newel

Melissa Newel
Attorney for Plaintiff
JERRY ANDRADE

12
13
14
15 Dated: December 10, 2025

ERIC GRANT
United States Attorney
MATTHEW W. PILE
Associate General Counsel
Office of Program Litigation, Office 7

16
17
18 By: Oscar Gonzalez de Llano*

OSCAR GONZALEZ DE LLANO
Special Assistant United States Attorney
Attorney for Defendant
(*authorized by email dated 12/10/2025)

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

ORDER

Good cause having been shown, IT IS ORDERED that Plaintiff shall be granted an extension of time of thirty (30) days to file his Opening Brief. The Opening Brief shall be filed on or before January 14, 2026 and all deadlines are modified accordingly.

IT IS SO ORDERED.

Dated: December 11, 2025

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE