

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

L.N.P.)
on his own behalf and on behalf of his)
dependent children P.D.P. and L.D.P.)
and on behalf of all others similarly situated)
)
Plaintiffs,)
)
- versus -) Case No. 1:24-cv-01196 (MSN/IDD)
)
FRANK BISIGNANO,)
Commissioner of Social Security Administration,)
et al.,)
)
Defendants.)
)

CONSENT MOTION TO CONTINUE HEARING

Pursuant to Federal Rule of Civil Procedure 6(b) and Local Civil Rule 7(G), Plaintiff and Class Representative L.N.P, on his own behalf and on behalf of his dependent children P.D.P. and L.D.P., and on behalf of the certified class (collectively, the “Plaintiffs”), by undersigned appointed Class Counsel, respectfully requests a one-week continuance for the hearing date—from January 16, 2026 to January 23, 2026—on Plaintiffs’ pending Motion to Enforce the Court’s July 16, 2025 Order (“Motion to Enforce”). Dkt. 121. In support of this motion, Plaintiffs state as follows:

1. On December 17, 2025, Plaintiffs filed the Motion to Enforce seeking to obtain full and accurate class information from the Social Security Administration (“SSA”) in accordance with the Court’s prior orders.
2. On December 23, 2025, SSA produced a supplemental class list.

3. On December 24, 2025, Plaintiffs sent a letter to SSA raising numerous issues and potential deficiencies regarding the supplemental class list.
4. On January 9, 2026, SSA responded to Plaintiffs' letter and stated that it is in the process of compiling additional data for Plaintiffs concerning the supplemental class list and stated that it would provide that information to Plaintiffs by the end of this week, January 16, 2026.
5. Continuing the hearing date for one week to January 23, 2026, will allow SSA additional time to produce the requested information and for Class Counsel to review it and determine whether to withdraw the Motion to Enforce.
6. If the agency provides satisfactory responses to Plaintiffs' requests, Plaintiffs will gladly withdraw its Motion to Enforce.
7. The requested relief will not prejudice the parties in this case, nor will it cause undue delay.
8. Defendants consent to the continuance of the hearing date from January 16 to January 23, 2026.

WHEREFORE, and for good cause shown, Plaintiffs hereby request that the Court enter the attached Proposed Order approving the continuance.

Dated: January 12, 2026

Respectfully submitted,

/s/ Joseph J. Green

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Counsel for Plaintiffs and the class

CERTIFICATE OF SERVICE

I hereby certify that on this 12th day of January 2026, Plaintiffs' Consent Motion to Continue Hearing was uploaded to this Court's CM/ECF system, which will electronically serve a copy of the same on all counsel of record.

Respectfully submitted,

/s/ Joseph J. Green

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