

1 McGREGOR W. SCOTT
 United States Attorney
 2 LUCILLE GONZALES MEIS
 Regional Chief Counsel, Region IX
 Social Security Administration
 3
 4 SARAH RYAN, State Bar of Texas #17479500
 Special Assistant United States Attorney

5
 6 333 Market Street, Suite 1500
 San Francisco, California 94105
 Telephone: (415) 977-8943
 7 Facsimile: (415) 744-0134
 8 E-Mail: sarah.ryan@ssa.gov

9 Attorneys for Defendant

10 UNITED STATES DISTRICT COURT
 11 EASTERN DISTRICT OF CALIFORNIA
 12 **FRESNO DIVISION**

14	GUADALUPE ORTIZ,)	
15)	CIVIL NO. 1:08-CV-00598 SMS
16	Plaintiff,)	
17	v.)	STIPULATION AND ORDER TO
18	MICHAEL J. ASTRUE,)	EXTEND TIME FOR DEFENDANT
19	Commissioner of)	TO FILE OPPOSITION TO
20	Social Security,)	PLAINTIFF'S OPENING BRIEF
21	Defendant.)	

22
 23 The parties, through their respective counsel, stipulate that the time for filing defendant's
 24 opposition to plaintiff's opening brief be extended from January 12, 2009, to February 11, 2009.

25 This is defendant's first request for an extension of time to file a response to plaintiff's opening
 26 brief. Defendant needs the additional time because the undersigned attorney of record for Defendant,
 27 Commissioner of Social Security in this case, must fly to Texas for a family medical emergency on
 28 January 1, 2009, and is expected to be away for at least ten days or longer. Thus, she will not be able to

1 prepare Defendant's response in this case. Due to the fact that a number of colleagues of the
2 undersigned attorney have taken leave during this holiday season and are expected to face a backlog of
3 work and heavy caseload when they return after the first of the year 2009, said attorney and her
4 supervisor believe there are no other attorneys in Defendant's office who will be available within the
5 next few days who could substitute for said attorney and prepare Defendant's response in place of said
6 attorney. Therefore, Defendant requests that an extension of thirty days be granted for Defendant to file
7 his response and supporting authority.
8

9 Respectfully submitted,

10 Dated: December 31, 2008.

/s/ Young Cho on behalf of Laura Krank
(As authorized)
LAURA KRANK
Attorney for Plaintiff

13 Dated: December 31, 2008.

14 MCGREGOR W. SCOTT
United States Attorney
15 LUCILLE GONZALES MEIS
Regional Chief Counsel, Region IX
16 Social Security Administration

17 /s/ Sarah Ryan
18 SARAH RYAN
19 Special Assistant U.S. Attorney

20 **IT IS SO ORDERED:**

21
22
23 Dated: 1/5/2009

24 /s/ Sandra M. Snyder
25 THE HONORABLE SANDRA M. SNYDER
26 United States Magistrate Judge
27
28