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THEOPHOUS H. REAGANS
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8 Attorneys for Defendant

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

12 VY NORNG,

13 Plaintiff,

14 v.

15 MICHAEL J. ASTRUE,
16 Commissioner of
Social Security,

17 Defendant.
18 _____

CIVIL NO. 1:09-CV-1505

STIPULATION FOR EXTENSION OF TIME
TO FILE DEFENDANT'S CROSS-MOTION

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20 IT IS HEREBY STIPULATED by the undersigned for the respective parties, subject to the approval
21 of the Court, that Defendant shall have a 40-day extension of time up to and through October 19, 2010, in
22 which to e-file his Cross-Motion. This extension is requested because of Defense Counsel is evaluating the
23 defensibility of this case. Counsel apologizes for not filing this request prior to the date that the Cross-
24 Motion was due. Plaintiff's counsel agreed to stipulate to an extension on or about October 8, 2010, but
25 Defendant's counsel neglected to file the stipulation and request with the Court until today when it was
26 brought to his attention by Plaintiff's counsel that the documents had not been filed. Counsel apologizes
27 for any delay and inconvenience caused to the Court and respectfully requests that the Court grant this
28 unopposed request for extension.

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2 Dated: September 8, 2010

(As authorized via email on 9/8/2010)
Denise Bourgeois Haley
Attorney for Plaintiff

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5 BENJAMIN B. WAGNER
United States Attorney
6 LUCILLE GONZALES MEIS
Regional Chief Counsel, Region IX
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8 Dated: September 8, 2010

By: /s/ Theophous H. Reagans
THEOPHOUS H. REAGANS
Special Assistant United States Attorney
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11 IT IS SO ORDERED.

12 Dated: September 20, 2010

/s/ Jennifer L. Thurston
UNITED STATES MAGISTRATE JUDGE
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