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13 Attorneys for Defendant

14 15 UNITED STATES DISTRICT COURT  
16 EASTERN DISTRICT OF CALIFORNIA

17 18 **FRESNO DIVISION**

19 20 LARRY TRUNDLE, ) CIVIL NO. 1:09-CV-02058 JLT  
21 Plaintiff, )  
22 v. ) STIPULATION AND ORDER TO EXTEND  
23 MICHAEL J. ASTRUE, ) TIME  
24 Acting Commissioner of )  
25 Social Security, )  
26 Defendant. )  
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19 The parties hereby stipulate by counsel, with the Court's approval as indicated by issuance of the  
20 attached Order, that Defendant shall have an extension of time of 30 days to respond to Plaintiff's  
21 Opening Brief up to and including September 24, 2010. This extension is being sought because, from  
22 the time Plaintiff filed his brief and the current due date of August 25, 2010, the undersigned Counsel for  
23 the Commissioner has been assigned additional work loads that require reviewing other attorneys' cases  
24 for voluntary remand considerations and reviewing the appellate briefs of her colleagues. This work  
25 load is unpredictable and requires immediate attention. Since Plaintiff filed his brief, counsel has had to  
26 adjust to this new work load and had to draft and two appellate briefs, 4 other district court briefs and  
27 participate in a mandatory training for two work days. Given these workloads, Counsel for the  
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1 Commissioner was not able to complete the Commissioner's response by the current due date and  
2 respectfully requests an additional 30 days.

3 The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.  
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5 Respectfully submitted,

6 */s/Sengthiene Bosavanh*

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SENGTHIENE BOSAVANH  
8 (as authorized via email)  
Attorney at Law

9 Attorney for Plaintiff

10 Dated: August 25, 2010

11 BENJAMIN B. WAGNER  
United States Attorney  
12 LUCILLE GONZALES MEIS  
Regional Chief Counsel, Region IX  
13 Social Security Administration

14 By:

15 */s/ Elizabeth Firer*

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ELIZABETH FIRER  
17 Special Assistant U.S. Attorney  
Attorneys for Defendant

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20 IT IS SO ORDERED.

21 Dated: August 26, 2010

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**/s/ Jennifer L. Thurston**  
23 UNITED STATES MAGISTRATE JUDGE  
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