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

13 TRINA EVERETT,
 14 Plaintiff,
 15 v.
 16 MICHAEL J. ASTRUE,
 17 Commissioner of Social Security,
 18 Defendant.

CASE NO. 1:10-CV-01831-LJO-BAM

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STIPULATION AND ORDER FOR SECOND
 EXTENSION OF TIME TO FILE
 DEFENDANT’S RESPONSIVE BRIEF

20 The parties hereby stipulate through counsel, with the Court's approval as indicated by issuance
 21 of the attached Order, that Defendant shall have a second extension of time of 30 days to file his
 22 responsive brief. The current due date was November 16, 2011, and the new due date will be
 23 December 16, 2011.

24 The extension is being sought because this case was recently reassigned to the undersigned
 25 counsel for the Commissioner on top of her already-existing full caseload. Several senior attorneys have
 26 recently left the regional counsel’s office and cannot be replaced due to the hiring freeze, including a
 27 senior attorney who retired, a senior attorney who relocated to Baltimore, and our regional chief counsel
 28 who received a promotion. This reduced staffing makes reassignment of the case to another attorney an

1 impossibility, as no other attorney is available to take on additional duties. In addition, undersigned
2 counsel has had ongoing intermittent medical leave and absence from the office. Counsel apologizes to
3 the Court for the timing of this request, as she was out of the office before and after the previous
4 deadline of November 16, 2011. Undersigned counsel also has long-scheduled travel planned for
5 November 23– 29, 2011.

6 Also, following the change in Chief Counsel in the regional office, there have recently been
7 major changes in office organization directly impacting the undersigned counsel’s responsibilities,
8 including overhauls in the manner in which work is assigned, completed, and reviewed, and the
9 undersigned has been asked to train other attorneys in new roles, which has required in-depth meetings
10 and coordination. Given these constraints, the Commissioner respectfully requests 30 additional days in
11 which to complete the Commissioner’s response to Plaintiff’s Opening Brief.

12 The parties further stipulate that the Court’s Scheduling Order shall be modified accordingly.

13 Respectfully submitted,

14 Dated: November 18, 2011

/s/ Sengthiene Bosavanh
(As authorized via e-mail)
SENGTHIENE BOSAVANH
Attorney for Plaintiff

17 Dated: November 18, 2011

BENJAMIN B. WAGNER
United States Attorney

/s/ Brenda M. Pullin
BRENDA M. PULLIN
Special Assistant U.S. Attorney

22 IT IS SO ORDERED.

23 Dated: November 22, 2011

/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE