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8 Attorneys for Defendant

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

12	BELVA GONZALES,)	
)	CIVIL NO. 2:10-cv-03412 EFB
13	Plaintiff,)	
)	
14	v.)	STIPULATION AND ORDER
)	
15	MICHAEL J. ASTRUE,)	
	Commissioner of)	
16	Social Security,)	
)	
17	Defendant.)	
)	

18
 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 a FIRST extension of 30 days to respond to Plaintiff’s motion for
 21 summary judgment up to and including November 21 (day 30 falls on a Sunday).

22 This extension is being sought based on additional unexpected and unavoidable work of the
 23 undersigned counsel for the Commissioner between the time Plaintiff filed her Opening Brief and October
 24 21, 2011 as well as major changes in the Commissioner’s regional office directly impacting the undersigned
 25 counsel’s responsibilities. Counsel is one of a few senior attorneys in the Commissioner’s office responsible
 26 for analyzing cases for possible affirmative appeal. Due to the required concert with the Commissioner’s
 27 headquarters and the United States Department of Justice, this work has extremely tight deadlines. The
 28 Commissioner’s Regional office must hold conferences with senior staff and make its recommendation to

1 headquarters within 48 hours of an adverse district court decision. In the time in question, four cases have
2 come up for such review requiring the undersigned counsel to suspend everything and familiarize herself
3 with a new case in significant depth.

4 Additionally, following the change in Chief Counsel in the Commissioner's regional office, major
5 overhauls in the manner in which work is assigned, completed and reviewed are being instated and the
6 undersigned has been asked to take on new roles, which have required immediate strategizing involving
7 detailed meetings and coordination with people in earlier time zones. Finally, counsel was out of the office
8 from October 6-11, 2011 on previously scheduled leave and had to complete a Ninth Circuit brief and
9 review in the week following her return. Given this work load, the Commissioner respectfully requests 30
10 additional days in order to complete the Commissioner's response to Plaintiff's Opening Brief.

11 The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

12 Dated: October 19, 2011

Respectfully submitted,
/s/ *Bess M. Brewer*
(As authorized via email)
BESS M. BREWER
Attorney for Plaintiff

15 Dated: October 19, 2011

BENJAMIN B. WAGNER
United States Attorney
DONNA L. CALVERT
Acting Regional Chief Counsel, Region IX
Social Security Administration

/s/ *Elizabeth Firer*
ELIZABETH FIRER
Special Assistant U.S. Attorney
Attorneys for Defendant

20 ORDER

22 APPROVED AND SO ORDERED.

23 DATED: October 20, 2011.

24 
EDMUND F. BRENNAN
UNITED STATES MAGISTRATE JUDGE