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8 Attorneys for Defendant

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

13 WILLIAM FRANCIS KLAUS, )  
 )  
 14 Plaintiff, )  
 )  
 15 v. )  
 )  
 16 MICHAEL J. ASTRUE, )  
 Commissioner of Social Security, )  
 17 Defendant. )  
 18 \_\_\_\_\_ )

CASE NO. 2:11-CV-00086-GGH

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STIPULATION AND ~~PROPOSED~~ ORDER  
 FOR FIRST EXTENSION OF TIME TO FILE  
 DEFENDANT’S CROSS-MOTION

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 first extension of time of 30 days to file his  
 22 cross-motion for summary judgment.

23 The extension is being sought because defendant’s counsel has had ongoing frequent medical  
 24 leave and absences from the office during the past month. In addition, reduced staffing makes  
 25 reassignment of the case to another attorney an impossibility, as no other attorney is available to take on  
 26 additional duties. Several senior attorneys have recently left the regional counsel’s office and cannot be  
 27 replaced due to the hiring freeze, including a senior attorney who retired, a senior attorney who relocated  
 28 to Baltimore, and our regional chief counsel who received a promotion.

