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8 Attorneys for Defendant

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

13 RHONDA KLEV,)
)
 14 Plaintiff,)
)
 15 v.)
)
 16 MICHAEL J. ASTRUE,)
 Commissioner of Social Security,)
 17 Defendant.)
 18 _____)

CASE NO. 2:11-CV-00863-GGH

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

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 20
 21 The parties hereby stipulate through counsel, with the Court’s approval as indicated by issuance
 22 of the attached Order, that Defendant shall have a first extension of time of 30 days to file his
 23 cross-motion for summary judgment.

24 The extension is being sought due to defendant’s counsel’s heavy workload during the past
 25 month combined with her long-scheduled holiday leave and cross-country travel. In addition, reduced
 26 staffing makes reassignment of the case to another attorney an impossibility, as no other attorney is
 27 available to take on additional duties. Several senior attorneys have recently left the regional counsel’s
 28 office and cannot be replaced due to the hiring freeze.

1 Given these constraints, the Commissioner respectfully requests 30 additional days in which to
2 complete the Commissioner's cross-motion for summary judgment. The new due date will be
3 February 8, 2012.

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

5 Respectfully submitted,

6 Dated: January 11, 2012

7 /s/ Bess M. Brewer
8 (As authorized via e-mail)
9 BESS M. BREWER
10 Attorney for Plaintiff

11 Dated: January 9, 2012

12 BENJAMIN B. WAGNER
13 United States Attorney

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

17 IT IS SO ORDERED:

18 Dated: January 17, 2012

19 /s/ Gregory G. Hollows
20 UNITED STATES MAGISTRATE JUDGE