

1 BENJAMIN B. WAGNER
 United States Attorney
 2 DONNA CALVERT
 Acting Regional Chief Counsel, Region IX
 3 BRENDA M. PULLIN
 Special Assistant United States Attorney
 4 Social Security Administration

5 333 Market Street, Suite 1500
 San Francisco, California 94105
 6 Telephone: (415) 977-8975
 Facsimile: (415) 744-0134
 7 E-Mail: Brenda.Pullin@ssa.gov

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 THIRD
EXTENSION OF TIME TO FILE
DEFENDANT’S CROSS-MOTION

19
 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 third extension of time of 30 days to file his
 22 cross-motion for summary judgment.

23 The extension is being sought due to defendant’s counsel’s heavy workload at this time, coupled
 24 with counsel’s ongoing medical issues and the Regional Counsel’s impending office move. Because of
 25 ongoing medical issues and recurrent medical leave, the undersigned defense counsel has been working
 26 from home for several months, and during this time has attempted to maintain a full caseload.
 27 Unfortunately, reduced staffing makes reassignment of this case to another attorney an impossibility, as
 28 no other attorney is available to take on additional duties; several senior attorneys have left the regional

1 counsel's office and cannot be replaced due to the hiring freeze.

2 In addition, the Social Security Regional Counsel's office is currently preparing for an office
3 move during the latter part of March 2012, which preparations have taken more of counsel's time than
4 projected. Although currently working from home, defendant's counsel is responsible for moving her
5 own office, as well as helping to pack and move common office areas. Defendant's counsel also
6 anticipates that, after the move, unpacking and technological setup/troubleshooting will require
7 additional time before the office space is operational.

8 Given these constraints, the Commissioner respectfully requests 30 additional days in which to
9 complete the Commissioner's cross-motion for summary judgment. The new due date will be April 9,
10 2012.

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

12 Respectfully submitted,

13 Dated: March 10, 2012

14 /s/ Bess M. Brewer
15 (As authorized via e-mail)
16 BESS M. BREWER
17 Attorney for Plaintiff

18 Dated: March 10, 2012

19 BENJAMIN B. WAGNER
20 United States Attorney

21 /s/ Brenda M. Pullin
22 BREND A M. PULLIN
23 Special Assistant U.S. Attorney

24 IT IS SO ORDERED:

25 Dated: March 14, 2012

26 /s/ Gregory G. Hollows
27 UNITED STATES MAGISTRATE JUDGE
28