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7 Attorneys for Defendant

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

12 ALBERT JURADO, )  
 13 Plaintiff, )  
 14 v. )  
 15 MICHAEL J. ASTRUE, )  
 16 Commissioner of )  
 Social Security, )  
 17 Defendant. )  
 18 \_\_\_\_\_ )

CIVIL NO. 2:11-cv-1489-CMK

STIPULATION AND PROPOSED ORDER  
 TO EXTEND TIME TO FILE  
 DEFENDANT’S CROSS-MOTION FOR  
 SUMMARY JUDGMENT

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 time of 30 days to respond to Plaintiff’s  
 21 motion for summary judgment.

22 Counsel for Defendant respectfully requests an extension of time due to his workload, which  
 23 includes other district court briefs, as well as substantive non-litigation matters.

24 The current due date is January 11, 2012. The new due date will be February 10, 2012.

25 The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.  
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Respectfully submitted,

Dated: January 10, 2012

/s/ Ann Cerney  
(As authorized via email)  
Ann Cerney  
Attorney for Plaintiff

Dated: January 9, 2012

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

/s/ David Lerch  
DAVID LERCH  
Special Assistant U.S. Attorney

Attorneys for Defendant

ORDER

APPROVED AND SO ORDERED.

DATED: January 11, 2012

  
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**CRAIG M. KELLISON**  
UNITED STATES MAGISTRATE JUDGE