

1 MELINDA L. HAAG
 United States Attorney
 2 DONNA L. CALVERT, ISBN 6191786
 Acting Regional Chief Counsel, Region IX
 3 Social Security Administration
 ANN L. MALEY, CSBN 176877
 4 Special Assistant United States Attorney

5 333 Market Street, Suite 1500
 6 San Francisco, California 94105
 Telephone: (415) 977-8974
 7 Facsimile: (415) 744-0134
 E-Mail: Ann.Maley@ssa.gov

8 Attorneys for Defendant

9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA

12 GINO HERRERA,
 13 Plaintiff,

14 v.

15 MICHAEL J. ASTRUE,
 16 Commissioner of
 Social Security,
 17 Defendant.

CIVIL NO. 3:11-CV-03405

**STIPULATION FOR EXTENSION OF
 TIME AND PROPOSED ORDER**

18 _____)
 19 Parties, through their attorneys, move this Court for an Order granting Defendant until January
 20 17, 2012 within which to file his response to Plaintiff's Motion for Summary Judgment (the response is
 21 currently due on January 3, 2012).

22 Good cause exists for this extension. Due to Defendant's counsel unexpected leave in December
 23 and the press of business, additional time is now needed to complete Defendant's opposing brief. This
 24 is Defendant's first request for an extension.

25 It is respectfully requested that the Court approve this stipulation and grant Defendant up to and
 26 including January 17, 2012 to file its opposition and cross-motion for summary judgment.
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 28

Respectfully submitted,

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2 DATED: December 29, 2011

By: */s/Daniel Homer*
(As agreed via email on 12/29/11)
DANIEL HOMER
Attorney at Law
Attorney for Plaintiff

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7 Dated: December 29, 2011

MELINDA L. HAAG
United States Attorney

8
9 */s/ Ann L. Maley*
ANN L. Maley
Special Assistant U.S. Attorney

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11 Attorneys for Defendant

12 Pursuant to stipulation, IT IS ORDERED that Defendant's time to respond to Plaintiff's
13 motion for summary judgment is extended from January 3, 2012 to January 17, 2012.

14
15 DATED: December 30, 2011

Elizabeth D. Laporte
ELIZABETH D. LAPORTE
UNITED STATES MAGISTRATE JUDGE