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8 Attorneys for Defendant

9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 SAN FRANCISCO DIVISION

12 CHARLIE LLOYD III,
 13 Plaintiff,
 14 v.
 15 MICHAEL J. ASTRUE,
 16 Commissioner of Social Security
 17 Defendant.

CASE NO. 3:11-cv-4902-EMC
 STIPULATION AND PROPOSED ORDER
 FOR FIRST EXTENSION OF TIME TO
 FILE DEFENDANT'S CROSS-MOTION

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 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 due to defendant's counsel's workload during the past month
 24 coupled with the Social Security Regional Counsel's move to new office space at the end of March
 25 2012—with all the associated preparations, organization, meetings, packing, and unpacking—which
 26 have taken more of counsel's time than projected. Defendant's counsel was responsible for moving her
 27 own office as well as helping to pack and move common office areas such as the fax and mail center,
 28 file areas, and unoccupied cubicles. In addition, after the move, unpacking and technological

1 setup/troubleshooting of computer equipment has required additional unanticipated time and IT
2 assistance before counsel's office has become fully functional.

3 Given these constraints, along with counsel's existing workload, the Commissioner respectfully
4 requests 30 additional days in which to complete the Commissioner's cross-motion. The new due date
5 will be May 30, 2012.

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

7 Respectfully submitted,

8 Dated: April 30, 2012

/s/ Robert C. Weems
(As authorized via e-mail)
ROBERT C. WEEMS
Attorney for Plaintiff

11 Dated: April 30, 2012

MELINDA L. HAAG
United States Attorney

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

17 IT IS SO ORDERED:

19 Dated: 4/30/12

