

1 MELINDA L. HAAG, SBN CA 132612  
 United States Attorney  
 2 DONNA CALVERT, SBN IL 6191786  
 Acting Regional Chief Counsel, Region IX  
 3 Social Security Administration  
 BRENDA M. PULLIN, SBN CO 35181  
 4 Special Assistant United States Attorney

5 160 Spear Street, Suite 800  
 San Francisco, CA 94105  
 6 Telephone: 415-977-8975  
 Fax: 415-744-0134  
 7 E-mail: Brenda.Pullin@ssa.gov

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

18 STIPULATION AND PROPOSED ORDER  
 19 FOR SECOND EXTENSION OF TIME TO  
 20 FILE DEFENDANT'S CROSS-MOTION

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 second 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 compounded workload during the  
 25 past month coupled with the Social Security Regional Counsel's move to new offices at the end of  
 26 March 2012, which took more of counsel's time than projected. Defendant's counsel was responsible  
 27 for moving her own office as well as helping to pack and move common office areas such as the fax and  
 28 mail center, file areas, and unoccupied cubicles. In addition, after the move, unpacking and  
 technological setup/troubleshooting of computer equipment required additional unanticipated time and

1 IT assistance before counsel's office could become fully functional.

2 Defendant's counsel has been diligently working through the resultant backlog of cases in the  
3 order of their original due dates.

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

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

8 Respectfully submitted,

9 Dated: June 1, 2012

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

12 Dated: June 1, 2012

MELINDA L. HAAG  
United States Attorney

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

18 IT IS SO ORDERED:

20 Dated: June 8, 2012  
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