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1 2 3 4 5 6 7 8	MELINDA L. HAAG, SBN CA 132612 United States Attorney DONNA CALVERT, SBN IL 6191786 Acting Regional Chief Counsel, Region IX BRENDA M. PULLIN, SBN CO 35181 Special Assistant United States Attorney Social Security Administration 333 Market Street, Suite 1500 San Francisco, California 94105 Telephone: (415) 977-8975 Facsimile: (415) 744-0134 E-Mail:Brenda.Pullin@ssa.gov	
9	UNITED STATES DISTRICT COURT	
10	NORTHERN DISTRICT OF CALIFORNIA	
1	OAKLAND DIVISION	
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13	ESTHER SULLEN,)	
13	Plaintiff,	CASE NO. 4:10-CV-5898-CW
15	V.)	STIPULATION AND PROPOSED ORDER
16	MICHAEL J. ASTRUE, Commissioner of Social Security,	FOR FIRST EXTENSION OF TIME TO FILE DEFENDANT'S CROSS-MOTION FOR SUMMARY JUDGMENT
17) Defendant.	
18)	
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The parties hereby stipulate through counsel, with the Court's approval as indicated by issuance of the attached Order, that Defendant shall have a first extension of time of 30 days to file his cross-motion for summary judgment.

The extension is being sought due to defendant's counsel's heavy workload during the past month combined with her long-scheduled holiday leave and extended cross-country travel to visit family. In addition, reduced staffing makes reassignment of the case to another attorney an impossibility, as no other attorney is available to take on additional duties. Several senior attorneys have recently left the regional counsel's office and cannot be replaced due to the hiring freeze.

1	Given these constraints, the Commissioner respectfully requests 30 additional days in which to	
2	complete the Commissioner's cross-motion for summary judgment. The new due date will be	
3	February 6, 2012.	
4	The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.	
5	Respectfully submitted,	
6	Dated: January 10, 2012 /s/ Tony Arjo	
7	(As authorized via e-mail) TONY ARJO	
8	Attorney for Plaintiff	
9	Dated: January 10, 2012 BENJAMIN B. WAGNER	
10	United States Attorney	
11	/s/ Brenda M. Pullin	
12	BRENDA M. PULLIN Special Assistant U.S. Attorney	
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16	IT IS SO ORDERED:	
17	Dated: 1/19/2012	
18	SLEODIA WILKEN United States District Judge	
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