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9 UNITED STATES DISTRICT COURT
 10 NORTHERN DISTRICT OF CALIFORNIA
 11 OAKLAND DIVISION

13 ESTHER SULLEN,)
)
 14 Plaintiff,)
)
 15 v.)
)
 16 MICHAEL J. ASTRUE,)
 Commissioner of Social Security,)
)
 17 Defendant.)
 18 _____)

CASE NO. 4:10-CV-5898-CW

STIPULATION AND ~~PROPOSED~~ ORDER
 FOR FIRST EXTENSION OF TIME TO FILE
 DEFENDANT’S CROSS-MOTION FOR
 SUMMARY JUDGMENT

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

