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5 Attorneys for Plaintiff MICHAEL J. CLAMP

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7 **UNITED STATES DISTRICT COURT**
8 **EASTERN DISTRICT OF CALIFORNIA**
9

10 MICHAEL J. CLAMP,) Case No.: 2:16-CV-00248-SMS
11 Plaintiff,)
12 vs.) STIPULATION TO EXTEND
13) BRIEFING SCHEDULE; ORDER
14 CAROLYN COLVIN, Acting)
15 Commissioner of Social Security,)
16 Defendant)

17 TO THE HONORABLE SANDRA M. SNYDER, MAGISTRATE JUDGE
18 OF THE DISTRICT COURT:

19 Plaintiff Michael J. Clamp (“Plaintiff”) and defendant Carolyn Colvin,
20 Acting Commissioner of Social Security (“Defendant”), through their undersigned
21 counsel of record, hereby stipulate, subject to the approval of the Court, to extend
22 the time for Plaintiff to provide Defendant with Plaintiff’s Settlement Letter Brief
23 to August 30, 2016; and that Defendant shall have until October 4, 2016, to
24 provide a response, all other dates as set forth in the Case Management Order are
25 adjusted accordingly.
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1 An extension of time for plaintiff is needed in order to properly address the
2 issues within the administrative record in this matter as well as the demands arising
3 from complications related to Counsel Spouse's terminal illness which has
4 unexpectedly worsened in the last few weeks. Subsequent to a surgical procedure
5 on July 6, 2016 to remove tumors in the spine/hip as a result of stage 4 breast
6 cancer, Counsel's spouse was not discharged until July 9, 2016 and then Counsel's
7 spouse was re-admitted to the hospital for 5 days on July 15, 2016 due to
8 complications arising from the July 6th surgery. Counsel's spouse was also
9 recently admitted on August 1, 2016 and then discharged on August 5, 2016, to
10 provide treatment for intractable pain related to the terminal illness.

11 Counsel sincerely apologizes to the court for any inconvenience this may
12 have had upon it or its staff.

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DATE: August 30, 2016

Respectfully submitted,

LAW OFFICES OF LAWRENCE D. ROHLFING

/s/ Steven G. Rosales

BY: _____

Steven G. Rosales

Attorney for plaintiff MICHAEL J. CLAMP

DATED: August 30, 2016

PHILLIP A. TALBERT

Acting United States Attorney

**/S/- Chantal R. Jenkins*

Chantal R. Jenkins

Special Assistant United States Attorney

Attorney for Defendant

[*Via email authorization]

1 IT IS HEREBY ORDERED that plaintiff may have an extension of time, to
2 and including August 30, 2016, for Plaintiff to provide Defendant with Plaintiff's
3 Settlement Letter Brief; Defendant may have an extension of time to October 4,
4 2016 to provide a response, all other dates as set forth in the Case Management
5 Order are adjusted accordingly.

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8 IT IS SO ORDERED.

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Dated: September 6, 2016

/s/ Sandra M. Snyder
UNITED STATES MAGISTRATE JUDGE

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