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9 Attorneys for Plaintiff SHERRI RENEE TELNAS

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**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA**

SHERRI RENEE TELNAS,)	Case No.: 1:16-cv-00583-EPG
Plaintiff,)	STIPULATION TO EXTEND
vs.)	BRIEFING SCHEDULE
CAROLYN COLVIN, Acting)	
Commissioner of Social Security,)	
Defendant)	

TO THE HONORABLE ERICA P. GROSJEAN, MAGISTRATE JUDGE
OF THE DISTRICT COURT:

Plaintiff Sherri Renee Telnas (“Plaintiff”) and defendant Carolyn Colvin, Acting Commissioner of Social Security (“Defendant”), through their undersigned counsel of record, hereby stipulate, pursuant to the Court’s Scheduling Order, to extend the time for Plaintiff to provide Defendant with Plaintiff’s Settlement Letter Brief to December 2, 2016; and that Defendant shall have until January 6, 2017, to provide a response.

1 This Court is aware that Counsel's Spouse battled Stage IV breast cancer
2 which metastasized initially to her liver and continued to progress with tumors in her
3 lungs, spine and brain. After exhausting all known chemotherapy treatments over
4 18 months ago and surviving on willful determination and profound faith alone
5 Counsel's wife has succumbed to her illness. On September 30, 2016 Counsel
6 gently held his wife as she relinquished her fight and passed away. Counsel
7 required time to deal with providing the appropriate respect to his spouse and to
8 assist his two elementary school age children return to a normal routine.

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

11
12 DATE: December 2, 2016

Respectfully submitted,

13 LAW OFFICES OF LAWRENCE D. ROHLFING

14 /s/ *Steven G. Rosales*

15 BY: _____

Steven G. Rosales

Attorney for plaintiff SHERRI RENEE TELNAS

16 DATE: December 2, 2016

BENJAMIN WAGNER

United States Attorney

Donna L. Calvert

Regional Chief Counsel, Region IX

Social Security Administration

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21 */S/- Marcelo N. Illarmo

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Marcelo N. Illarmo

Special Assistant United States Attorney

Attorney for Defendant

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24 [*Via email authorization]

1 IT IS HEREBY ORDERED that plaintiff may have an extension of time for
2 Plaintiff to provide Defendant with Plaintiff's Settlement Letter Brief to and
3 including December 2, 2016; Defendant may have an extension of time to January
4 6, 2017 to file her response.

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6 IT IS SO ORDERED.

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Dated: December 5, 2016

/s/ Eric P. Gray
UNITED STATES MAGISTRATE JUDGE

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