

1 Cyrus Safa
2 Attorney at Law: 282971
3 12631 East Imperial Highway, Suite C-115
4 Santa Fe Springs, CA 90670
5 Tel: (562)437-7006
6 Fax: (562)432-2935
7 E-Mail: rohlfing.office@rohlfinglaw.com
8 Attorneys for Plaintiff
9 CONNIE MALIA RAQUENIO

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA

CONNIE MALIA RAQUENIO) Case No.: 1:16-cv-01830-BAM
Plaintiff,) STIPULATION AND ORDER TO
v.) EXTEND TIME TO FILE
NANCY A. BERRYHILL, Acting) PLAINTIFF'S OPENING BRIEF
Commissioner of Social Security.) (SECOND REQUEST)
Defendant.)

Plaintiff Connie Malia Raquenio and Nancy A. Berryhill, Acting Commissioner of Social Security, through their undersigned attorneys, stipulate, subject to this court's approval, to extend the time by 3 days from August 22, 2017 to August 25, 2017 for Plaintiff to file Plaintiff's Opening Brief, with all other dates in the Court's Order Concerning Review Of Social Security Cases extended accordingly. This is Plaintiff's second request for an extension. This request is made at the request of Plaintiff's counsel who, due to unforeseen circumstances, covered two out-of-town hearings this week for another attorney from counsel's

1 firm on very short notice. As a result, counsel will need additional time to fully
2 research the issues presented.

3 DATE: August 22, 2017 Respectfully submitted,
4
5 /s/ *Cyrus Safa*
LAWRENCE D. ROHLFING

6 BY: _____
7 Cyrus Safa
Attorney for plaintiff Ms. Connie Malia Raquenio

DATE: August 22, 2017

PHILLIP A. TALBERT
United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel
Social Security Administration
/s/ Phillip A. Talbert

BY: _____
Sundeep Patel
Special Assistant United States Attorney
Attorneys for defendant Nancy A. Berryhill
|*authorized by e-mail|

ORDER

Pursuant to the stipulation of the parties, and for good cause appearing, IT IS HEREBY
17 ORDERED that Plaintiff shall have an extension of time to August 25, 2017, in which to file
18 Plaintiff's opening brief. All other deadlines set forth in the Court's Scheduling Order shall be
19 modified accordingly.
20

21 IT IS SO ORDERED.

22 || Dated: August 23, 2017

1/s/ Barbara A. McAuliffe
UNITED STATES MAGISTRATE JUDGE