

Cyrus Safa
Attorney at Law: 282971
12631 East Imperial Highway, Suite C-115
Santa Fe Springs, CA 90670
Tel: (562)437-7006
Fax: (562)432-2935
E-Mail: rohlfig.office@rohlfiglaw.com
Attorneys for Plaintiff
CONNIE MALIA RAQUENIO

**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
)	PLAINTIFF'S OPENING BRIEF
NANCY A. BERRYHILL, Acting)	
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 LAWRENCE D. ROHLFING

5 /s/ *Cyrus Safa*

6 BY: _____

Cyrus Safa

7 Attorney for plaintiff Ms. Connie Malia Raquenio

8 DATE: August 22, 2017

9 PHILLIP A. TALBERT

United States Attorney

10 DEBORAH LEE STACHEL

Regional Chief Counsel

11 Social Security Administration

12 /s/ *Sundeep Patel*

13 BY: _____

Sundeep Patel

14 Special Assistant United States Attorney

Attorneys for defendant Nancy A. Berryhill

15 [*authorized by e-mail]

16 **ORDER**

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

21 IT IS SO ORDERED.

22 Dated: August 23, 2017

23 /s/ *Barbara A. McAuliffe*

24 UNITED STATES MAGISTRATE JUDGE