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Attorneys for Plaintiff
MICHELLE L. ROQUE

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

MICHELLE L. ROQUE)	Case No.: 1:17-cv-00192-SKO
)	
Plaintiff,)	STIPULATION TO EXTEND TIME
v.)	TO FILE PLAINTIFF'S OPENING
)	BRIEF; ORDER
NANCY A. BERRYHILL, Acting)	
Commissioner of Social Security.)	(SECOND REQUEST)
)	
Defendant.)	(Doc. 21)
)	

Plaintiff Michelle L. Roque and Defendant Nancy A. Berryhill, Acting Commissioner of Social Security, through their undersigned attorneys, stipulate, subject to this court's approval, to extend the time by 28 days from December 7, 2017 to January 4, 2018 for Plaintiff to file a 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, the first being related to the settlement proposal.

This request is made at the request of Plaintiff's counsel to allow additional time to fully research the issues presented. Plaintiff's counsel missed work for part of last week due to the flu. Plaintiff's counsel subsequently attended an out-of-state

1 hearing within the last week. As a result of counsel's illness, counsel required
2 extensions on briefing due last week, which bled into the current week. Counsel
3 has had five dispositive motions due this week alone. Counsel attempted to get
4 ahead of the briefing by working over the weekend, but will be unable to complete
5 the briefing in this case by the end of the day.

6 Counsel has met with members of his office today and begun the process of
7 re-assigning several cases internally to help alleviate Counsel's workload and
8 avoid any further extensions. Counsel is aware of the Court's heavy workload and
9 sincerely apologizes for any inconvenience this request may have on the Court, its
10 staff, and all parties involved.

11 DATE: December 7, 2017

Respectfully submitted,

12 LAWRENCE D. ROHLFING

13 /s/ *Cyrus Safa*

14 BY: _____

Cyrus Safa

15 Attorney for plaintiff Michelle L. Roque

16 DATE: December 7, 2017

17 PHILLIP A. TALBERT

18 United States Attorney

19 DEBORAH LEE STACHEL

Regional Chief Counsel

20 Social Security Administration

21 /s/ *Margaret I. Branick-Abilla*

22 BY: _____

Margaret I. Branick-Abilla

23 Special Assistant United States Attorney

24 Attorneys for defendant Nancy A. Berryhill

|*authorized by e-mail|

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Plaintiff shall file her Opening Brief on or before January 4, 2018. All other deadlines set forth in the Scheduling Order (Doc. 11) are modified accordingly.

Dated: **December 8, 2017**

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