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9 Attorneys for Plaintiff LYNNE KELLER

10
11 **UNITED STATES DISTRICT COURT**
12 **EASTERN DISTRICT OF CALIFORNIA**
13

14 LYNNE KELLER) Case No.: 2:13-CV-221-CKD
15)
16 Plaintiff,) STIPULATION TO EXTEND
17) BRIEFING SCHEDULE
18 vs.)
19)
20 MICHAEL J. ASTRUE, Commissioner)
21)
22 of Social Security,)
23)
24 Defendant)
25)
26)

27 TO THE HONORABLE CAROLYN K. DELANEY, MAGISTRATE
28 JUDGE OF THE DISTRICT COURT:

29 Plaintiff Lynne Keller (“Plaintiff”) and defendant Michael Astrue,
30 Commissioner of Social Security (“Defendant”), through their undersigned counsel
31 of record, hereby stipulate, subject to the approval of the Court, to extend the time
32 for Plaintiff to file Plaintiff’s Opening Brief to August 23, 2013; and that
33 Defendant shall have until September 23, 2013, to file his opposition, if any is
34 forthcoming. Any reply by plaintiff will be due September 30, 2013.
35

1 An extension of time for plaintiff is needed due to a serious illness in
2 Counsel's family. Counsel Spouse receives chemotherapy treatment for her Stage
3 IV breast cancer which metastasized initially to her liver and continues to spread to
4 her lungs and spine. Counsel requires the additional time to file the Joint Stipulation
5 to allow him to devote the appropriate time to assist his Spouse and his two
6 kindergarten and pre-school aged children through this obviously stressful
7 experience. Counsel sincerely apologizes to the court for any inconvenience this
8 may have had upon it or its staff.

9
10 DATE: July 8, 2013

Respectfully submitted,

LAW OFFICES OF LAWRENCE D. ROHLFING

/s/ Steven G. Rosales

11 BY: _____

12 Steven G. Rosales

13 Attorney for plaintiff LYNNE KELLER

14
15 DATE: July 8, 2013

BENJAMIN WAGNER

United States Attorney

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18 */S/- Jean M. Turk

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20 _____
Jean M. Turk

Special Assistant United States Attorney

Attorney for Defendant

21 [*Via email authorization]
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1 IT IS HEREBY ORDERED that plaintiff may have an extension of time, to
2 and including August 23, 2013, in which to file Plaintiff's Opening Brief;
3 Defendant may have an extension of time to September 23, 2013 to consider the
4 contentions raised in Plaintiff's Opening Brief, and file any opposition if
5 necessary. Any reply by plaintiff will be due September 30, 2013.

6 IT IS SO ORDERED.

7 Dated: July 10, 2013

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10 CAROLYN K. DELANEY
11 UNITED STATES MAGISTRATE JUDGE
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