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5 Attorneys for Plaintiff ANGELA CLOSSON

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7 **UNITED STATES DISTRICT COURT**
8 **EASTERN DISTRICT OF CALIFORNIA**
9 **SACRAMENTO DIVISION**
10

11 ANGELA CLOSSON,) Case No.: 2:13-CV-2381 KJN
12)
Plaintiff,) STIPULATION TO EXTEND
13) BRIEFING SCHEDULE
vs.)
14)
CAROLYN COLVIN, Acting)
15)
Commissioner of Social Security,)
16)
Defendant)
17)

18 TO THE HONORABLE KENDALL J. NEWMAN, MAGISTRATE
19 JUDGE OF THE DISTRICT COURT:

20 Plaintiff Angela Closson (“Plaintiff”) and defendant Carolyn Colvin, Acting
21 Commissioner of Social Security (“Defendant”), through their undersigned counsel
22 of record, hereby stipulate, subject to the approval of the Court, to extend the time
23 for Plaintiff to file Plaintiff’s Motion for Summary Judgment or Remand to July
24 11, 2014; and that Defendant shall have until August 11, 2014, to file her
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1 opposition, if any is forthcoming. Any reply by plaintiff will be due August 18,
2 2014.

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

11
12 DATE: July 8, 2014

Respectfully submitted,

13 LAW OFFICES OF LAWRENCE D. ROHLFING

14 /s/ *Steven G. Rosales*

15 BY: _____
Steven G. Rosales
16 Attorney for plaintiff ANGELA CLOSSON

17 DATED: July 8, 2014

BENJAMIN WAGNER
United States Attorney

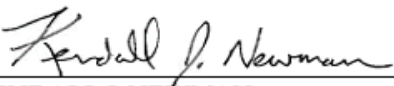
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20 */S/- Susan L. Smith

21 _____
Susan L. Smith
22 Special Assistant United States Attorney
23 Attorney for Defendant
24 [*Via email authorization]
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1 IT IS HEREBY ORDERED that plaintiff may have an extension of time, to
2 and including July 11, 2014, in which to file Plaintiff's Motion for Summary
3 Judgment or Remand; Defendant may have an extension of time to August 11,
4 2014 to file her opposition, if any is forthcoming. Any reply by plaintiff will be
5 due August 18, 2014.

6 IT IS SO ORDERED.

7 Dated: July 10, 2014

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10 KENDALL J. NEWMAN
11 UNITED STATES MAGISTRATE JUDGE
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