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10 Attorneys for Plaintiff LAURIE ANITA CLARK

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

LAURIE ANITA CLARK, ) Case No.: 2:14-CV-01586 AC  
vs. )  
CAROLYN COLVIN, Acting ) STIPULATION TO EXTEND  
Commissioner of Social Security, ) BRIEFING SCHEDULE  
Defendant )  
\_\_\_\_\_  
vs. )  
CAROLYN COLVIN, Acting )  
Commissioner of Social Security, )  
Defendant )

TO THE HONORABLE ALLISON CLAIRE, MAGISTRATE JUDGE OF  
THE DISTRICT COURT:

Plaintiff Laurie Anita Clark (“Plaintiff”) and defendant Carolyn Colvin,  
Acting Commissioner of Social Security (“Defendant”), through their undersigned  
counsel of record, hereby stipulate, subject to the approval of the Court, to extend  
the time for Plaintiff to file Plaintiff’s Motion for Summary Judgment to April 20,  
2015; and that Defendant shall have until May 20, 2015, to file her opposition.  
Any reply by plaintiff will be due June 10, 2015.

1 A second extension of time is needed because Plaintiff's Counsel's Spouse  
2 undergoes chemotherapy treatment for her Stage IV breast cancer which  
3 metastasized initially to her liver and continues to progress there and in her lungs,  
4 throat, and spine which required recent hospitalization to treat. Counsel requires the  
5 additional time to file the memorandum in support of complaint to allow him to  
6 devote the appropriate time to assist his Spouse and his two elementary school aged  
7 children through this obviously stressful experience. Counsel sincerely apologizes  
8 to the court for any inconvenience this may have had upon it or its staff. This  
9 request is made at the request of Plaintiff's counsel to allow additional time to fully  
10 research the issues presented.

16 DATED: March 6, 2015 BENJAMIN WAGNER  
17 United States Attorney

19 || \* /S/- Heather M. Moss

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Heather M. Moss  
Special Assistant United States Attorney  
Attorney for Defendant  
[\*Via email authorization]

1 IT IS HEREBY ORDERED that plaintiff may have an extension of time, to  
2 and including April 20, 2015, in which to file Plaintiff's Opening Brief; Defendant  
3 may have an extension of time to May 20, 2015 to file his opposition, if any is  
4 forthcoming. Any reply by plaintiff will be due June 10, 2015.

## 5 IT IS SO ORDERED.

6 | DATE: March 6, 2015

Allison Claire  
ALLISON CLAIRE  
UNITED STATES MAGISTRATE JUDGE