

1 Steven G. Rosales
 Attorney at Law: 222224
 2 Law Offices of Lawrence D. Rohlfing
 12631 East Imperial Highway, Suite C-115
 3 Santa Fe Springs, CA 90670
 Tel.: (562)868-5886
 4 Fax: (562)868-5491
 E-mail _steven.rosales@rohlfinglaw.com

5 Attorneys for Plaintiff BRITTANY S.M. TAYLOR

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

11 BRITTANY S.M. TAYLOR,)	Case No.: 2:16-CV-00747 CMK
12)	
13 Plaintiff,)	STIPULATION TO EXTEND
14)	BRIEFING SCHEDULE
15 vs.)	
16 CAROLYN COLVIN, Acting)	
17 Commissioner of Social Security,)	
18)	
19 Defendant)	

20 TO THE HONORABLE CRAIG M. KELLISON, MAGISTRATE JUDGE
OF THE DISTRICT COURT:

21 Plaintiff Brittany S.M. Taylor (“Plaintiff”) and defendant Carolyn Colvin,
 22 Acting Commissioner of Social Security (“Defendant”), through their undersigned
 23 counsel of record, hereby stipulate, subject to the approval of the Court, to extend
 24 the time for Plaintiff to file Plaintiff’s Motion for Summary Judgment or Remand
 25 to November 28, 2016; and that Defendant shall have until December 28, 2016, to
 26 file her opposition. Any reply by plaintiff will be due January 17, 2017.

1 An extension of time for plaintiff is needed in order to properly address the
2 issues within the administrative record in this matter as well as the demands arising
3 from complications related to Counsel Spouse's terminal illness which has
4 unexpectedly worsened in the last few weeks. Due to a deterioration in her
5 condition in the last few weeks, Counsel's spouse now requires in home medical
6 assistance 24 hours a day and Counsel has been required to devote time to
7 planning and managing the transition to end of life care. Counsel required time to
8 deal with this change in condition and has taken steps to secure the at home
9 hospice level care which his spouse now requires in order to better allow him to
10 attend to his professional obligations.

11 DATE: September 29, 2016 Respectfully submitted,

12 LAW OFFICES OF LAWRENCE D. ROHLFING

13 /s/ *Steven G. Rosales*

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

17 DATED: September 29, 2016 BENJAMIN WAGNER
18 United States Attorney

19 */S/- Marcelo N. Illarmo

20 _____
21 Marcela N. Illarmo
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 November 28, 2016, in which to file Plaintiff's Motion for Summary
3 Judgment or Remand; Defendant may have an extension of time to December 28,
4 2016 to file her opposition, if any is forthcoming. Any reply by plaintiff will be
5 due January 17, 2017.

6 IT IS SO ORDERED.

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9 Dated: October 27, 2016


CRAIG M. KELLISON
UNITED STATES MAGISTRATE JUDGE

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