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5 Attorneys for Plaintiff STEVEN R. CARLSON

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

11 STEVEN R. CARLSON, ) Case No.: 2:16-CV-01484 CKD  
12 Plaintiff, )  
13 vs. ) STIPULATION TO EXTEND  
14 NANCY A. BERRYHILL, Acting ) BRIEFING SCHEDULE  
15 Commissioner of Social Security, )  
16 Defendant )  
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18 TO THE HONORABLE CAROLYN K. DELANEY, MAGISTRATE  
19 JUDGE OF THE DISTRICT COURT:

20 Plaintiff Steven R. Carlson (“Plaintiff”) and defendant Nancy A. Berryhill,  
21 Acting Commissioner of Social Security (“Defendant”), through their undersigned  
22 counsel of record, hereby stipulate, subject to the approval of the Court, to extend  
23 the time for Plaintiff to file Plaintiff’s Motion for Summary Judgment or Remand  
24 to March 1, 2017; and that Defendant shall have until March 31, 2017, to file his  
25 opposition. Any reply by plaintiff will be due April 21, 2017.  
26

1 An extension of time for plaintiff is needed. As the Court is aware,  
2 Plaintiff's Spouse recently passed away. Due to the press of the holidays and the  
3 need to find a caregiver and the required time to acclimate his children to his  
4 absence to meet his professional obligations, Counsel requires the additional time  
5 to prepare and file his Motion for Summary Judgment or Remand.

6 Counsel sincerely apologizes to the court for any inconvenience this may  
7 have had upon it or its staff.

8 DATE: January 30, 2017

Respectfully submitted,

LAW OFFICES OF LAWRENCE D. ROHLFING

*/s/ Steven G. Rosales*

9 BY: \_\_\_\_\_  
10 Steven G. Rosales  
11 Attorney for plaintiff

12 DATED: January 30, 2017

BENJAMIN WAGNER  
United States Attorney

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16 \*/S/- Sundeep Patel

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Sundeep Patel  
Special Assistant United States Attorney  
Attorney for Defendant  
19 [\*Via email authorization]  
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