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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**
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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 29, 2017; and that Defendant shall have until April 28, 2017, to file his
25 opposition. Any reply by plaintiff will be due May 19, 2017.
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1 As the Court is aware, after a 5 year battle with terminal stage 4 cancer
2 Plaintiff's Spouse passed away on September 30, 2016. The aftermath of this
3 traumatic event on both Counsel and his 9 year old son and 7 year old daughter was
4 immeasurable. Compounding the impact of this loss is the fact that Counsel's
5 spouse was a former employee at Counsel's Law Firm and her death was far
6 reaching in its impact on Counsel's professional life as well. Due to the death, the
7 subsequent holiday period, and the need to find a permanent caregiver and the
8 required time to acclimate his children to that presence during his absence to meet
9 his professional obligations, Counsel requires the additional time to prepare and
10 file Plaintiff's Motion for Summary Judgment or Remand.

11 Counsel for plaintiff does not anticipate this extraordinary request for more
12 time to become the rule and recognizes it is the extraordinary exception and
13 sincerely apologizes to the court for any inconvenience this may have had upon it
14 or its staff.

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1 DATE: March 8, 2017

Respectfully submitted,

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LAW OFFICES OF LAWRENCE D. ROHLFING

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/s/ Steven G. Rosales

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BY: _____
Steven G. Rosales
Attorney for plaintiff

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6 DATED: March 8, 2017

BENJAMIN WAGNER
United States Attorney

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*/S/- Sundeep Patel

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

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IT IS HEREBY ORDERED that plaintiff may have an extension of time, to and including March 29, 2017, in which to file Plaintiff's Motion for Summary Judgment or Remand; Defendant may have an extension of time to April 28, 2017 to file his opposition, if any is forthcoming. Any reply by plaintiff will be due May 19, 2017.

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IT IS SO ORDERED.

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Dated: March 10, 2017

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Carolyn K. Delaney

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CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE

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