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5 Attorneys for Plaintiff CARRIE RUTH SAVAGE

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 7 **UNITED STATES DISTRICT COURT**
 8 **EASTERN DISTRICT OF CALIFORNIA**
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10 CARRIE RUTH SAVAGE,)	Case No.: 2:16-CV-01591 AC
11)	
12 Plaintiff,)	STIPULATION TO EXTEND
13)	BRIEFING SCHEDULE
14 vs.)	
15 NANCY A. BERRYHILL, Acting)	
16 Commissioner of Social Security,)	
17)	
18 Defendant)	

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

19 Plaintiff Carrie Ruth Savage (“Plaintiff”) and defendant Nancy A. Berryhill,
 20 Acting Commissioner of Social Security (“Defendant”), through their undersigned
 21 counsel of record, hereby stipulate, subject to the approval of the Court, to extend
 22 the time for Plaintiff to file Plaintiff’s Motion for Summary Judgment to April 12,
 23 2017; and that Defendant shall have until May 12, 2017, to file her opposition.
 24 Any reply by plaintiff will be due June 2, 2017.

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.

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.

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

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DATE: March 3, 2017

Respectfully submitted,
LAW OFFICES OF LAWRENCE D. ROHLFING
/s/ Steven G. Rosales
BY: _____
Steven G. Rosales
Attorney for plaintiff CARRIE RUTH SAVAGE

DATED: March 3, 2017

PHILLIP A. TALBERT
United States Attorney


*/S/- Jennifer Lee Tarn

Jennifer Lee Tarn
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 12, 2017, in which to file Plaintiff's Motion for Summary
3 Judgment; Defendant may have an extension of time to May 12, 2017 to file her
4 opposition, if any is forthcoming. Any reply by plaintiff will be due June 2, 2017.

5 IT IS SO ORDERED.

6 DATE: March 27, 2017

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8 ALLISON CLAIRE
9 UNITED STATES MAGISTRATE JUDGE
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