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5 Attorneys for Plaintiff CARRIE RUTH SAVAGE

6
 7 **UNITED STATES DISTRICT COURT**
 8 **EASTERN DISTRICT OF CALIFORNIA**
 9

10	CARRIE RUTH SAVAGE,)	Case No.: 2:16-CV-01591 AC
11)	STIPULATION TO EXTEND
12	Plaintiff,)	BRIEFING SCHEDULE
13	vs.)	
14	NANCY A. BERRYHILL, Acting)	
15	Commissioner of Social Security,)	
16	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 May 4,
 23 2017; and that Defendant shall have until June 5 2017, to file her opposition. Any
 24 reply by plaintiff will be due June 26, 2017.
 25
 26

1 As the Court is aware, Counsel suffered the loss of his spouse. Counsel
2 simply underestimated how profound his wife's long illness and unfortunate death
3 at the young age of 41 would, for lack of better description, break his stride both at
4 home and professionally. Counsel has recognized that the continued routine
5 request for extension is not tenable moving forward and has crafted a plan to
6 alleviate his case load with the assistance of other Attorney's from his firm. The
7 failure to more timely notify the Court of the need for more time was a result of a
8 miscommunication within Plaintiff's Counsel's firm as to the status of the due
9 date.

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

14 DATE: May 4, 2017

Respectfully submitted,

LAW OFFICES OF LAWRENCE D. ROHLFING

/s/ Steven G. Rosales

BY: _____
Steven G. Rosales
Attorney for plaintiff CARRIE RUTH SAVAGE

19 DATED: May 4, 2017

PHILLIP A. TALBERT
United States Attorney

22 */S/- Jennifer Lee Tarn

23 _____
24 Jennifer Lee Tarn
25 Special Assistant United States Attorney
26 Attorney for Defendant
[*Via email authorization]

