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5 Attorneys for Plaintiff LISA MARIE HALE

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

11	LISA MARIE HALE,	)	Case No.: 2:16-CV-01677 CMK
12		)	
13	Plaintiff,	)	STIPULATION TO EXTEND
14	vs.	)	BRIEFING SCHEDULE
15	NANCY A. BERRYHILL, Acting	)	
16	Commissioner of Social Security,	)	
17	Defendant	)	

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

20 Plaintiff Lisa Marie Hale (“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 April 21, 2017; and that Defendant shall have until May 22, 2017, to file her  
 25 opposition. Any reply by plaintiff will be due June 12, 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.

15 DATE: March 15, 2017

Respectfully submitted,

16 LAW OFFICES OF LAWRENCE D. ROHLFING

17 */s/ Steven G. Rosales*

18 BY: \_\_\_\_\_  
Steven G. Rosales  
Attorney for plaintiff LISA MARIE HALE

19 DATED: March 15, 2017

20 Phillip A. Talbert  
United States Attorney

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22 \*/S/- Ann L. Maley

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24 Ann L. Maley  
25 Special Assistant United States Attorney  
26 Attorney for Defendant  
[\*Via email authorization]

1           IT IS HEREBY ORDERED that plaintiff may have an extension of time, to  
2 and including April 21, 2017, in which to file Plaintiff's Motion for Summary  
3 Judgment or Remand; Defendant may have an extension of time to May 22, 2017  
4 to file her opposition, if any is forthcoming. Any reply by plaintiff will be due  
5 June 12, 2017.

6           IT IS SO ORDERED.

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8 Dated: March 16, 2017

  
CRAIG M. KELLISON  
UNITED STATES MAGISTRATE JUDGE

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