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5 Attorneys for Plaintiff LISA ROSE JAROSS

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 7 **UNITED STATES DISTRICT COURT**
 8 **EASTERN DISTRICT OF CALIFORNIA**
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<p>10 LISA ROSE JAROSS, 11 12 Plaintiff, 13 vs. 14 NANCY A. BERRYHILL, Acting 15 Commissioner of Social Security, 16 Defendant</p>	<p>) Case No.: 2:16-CV-01861 EFB)) STIPULATION TO EXTEND) BRIEFING SCHEDULE)))))))</p>
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17 TO THE HONORABLE EDMUND F. BRENNAN, MAGISTRATE
 18 JUDGE OF THE DISTRICT COURT:

19 Plaintiff Lisa Rose Jaross (“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 or Remand
 23 to March 30, 2017; and that Defendant shall have until May 1, 2017, to file her
 24 opposition. Any reply by plaintiff will be due May 22, 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 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

DATED: March 3, 2017

PHILLIP A. TALBERT
United States Attorney

*/S/- Daniel P. Talbert

Daniel P. Talbert
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 March 30, 2017, in which to file Plaintiff's Motion for Summary
3 Judgment or Remand; Defendant may have an extension of time to May 1, 2017 to
4 file her opposition, if any is forthcoming. Any reply by plaintiff will be due May
5 22, 2017.

6 IT IS SO ORDERED.

7 DATED: March 6, 2017.



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9 THE HONORABLE EDMUND F. BRENNAN
UNITED STATES MAGISTRATE JUDGE

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