

1 Denise Bourgeois Haley
 2 Attorney at Law: 143709
 3 12631 East Imperial Highway, Suite C-115
 4 Santa Fe Springs, CA 90670
 5 Tel: (562)437-7006
 6 Fax: (562)432-2935
 7 E-Mail: rohlfig.office@rohlfiglaw.com
 8 Attorneys for Plaintiff
 9 DONITA TARLETON

10 **UNITED STATES DISTRICT COURT**
 11 **EASTERN DISTRICT OF CALIFORNIA**

11	DONITA TARLETON)	Case No.: 2:16-cv-02516-AC
12	Plaintiff,)	
13	v.)	STIPULATION TO EXTEND TIME
14	NANCY A. BERRYHILL, Acting)	TO FILE MOTION FOR SUMMARY
15	Commissioner of Social Security.)	JUDGMENT
16	Defendant.)	(SECOND REQUEST)
17)	
18)	

19 Plaintiff Donita Tarleton and Defendant Nancy A. Berryhill, Acting
 20 Commissioner of Social Security, through their undersigned attorneys, stipulate,
 21 subject to this court’s approval, to extend the time by 30 days from April 24, 2017
 22 to May 24, 2017 for Plaintiff to file a motion for summary judgment, with all other
 23 dates in the Court’s Order Concerning Review Of Social Security Cases extended
 24 accordingly. This is Plaintiff’s second request for an extension. This request is made
 25 at the request of Plaintiff’s counsel to allow additional time to fully research the
 26 issues presented. Counsel’s workload has been impacted due to the loss of an

1 attorney last July and both replacements not working out. Counsel's firm has since
2 hired two new attorneys who will relieve the case load but not yet. Hence,
3 counsel's case load has been fragile for a while and on Saturday, April 15, 2017,
4 counsel was injured in an auto accident, not seriously, but causing her to miss
5 work a few days and be unable to complete certain tasks; this motion being one of
6 the tasks. Counsel will not request further extension and respectfully requests this
7 extension in good faith.

8 DATE: April 24, 2017

Respectfully submitted,

LAWRENCE D. ROHLFING

/s/ Denise Bourgeois Haley

9
10 BY: _____

Denise Bourgeois Haley

Attorney for plaintiff Ms. Donita Tarleton

11
12
13
14 DATE: April 24, 2017

PHILLIP A. TALBERT

United States Attorney

/s/ Jennifer A. Kenney

15
16
17 BY: _____

Jennifer A. Kenney


Special Assistant United States Attorney

Attorneys for defendant Nancy A. Berryhill

|*authorized by e-mail|

18
19
20
21 IT IS SO ORDERED.

22 DATED: April 25, 2017

23
24 
25 ALLISON CLAIRE
26 UNITED STATES MAGISTRATE JUDGE