

1 Steven G. Rosales
 Attorney at Law: 222224
 2 Law Offices of Lawrence D. Rohlfing
 12631 East Imperial Highway, Suite C-115
 3 Santa Fe Springs, CA 90670
 Tel.: (562)868-5886
 4 Fax: (562)868-5491
 E-mail steven.rosales@rohlfinglaw.com

5 Attorneys for Plaintiff JOESHANA CARD

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

10	JOESHANA CARD,)	Case No.: CV 15-5201 MEJ
11)	
12	Plaintiff,)	STIPULATION TO EXTEND
13)	BRIEFING SCHEDULE
14	vs.)	
15	CAROLYN COLVIN, Acting)	
16	Commissioner of Social Security,)	
	Defendant)	

17 TO THE HONORABLE MARIA ELENA JAMES, MAGISTRATE JUDGE
18 OF THE DISTRICT COURT:

19 Plaintiff Joeshana Card (“Plaintiff”) and defendant Carolyn Colvin, Acting
 20 Commissioner of Social Security (“Defendant”), through their undersigned counsel
 21 of record, hereby stipulate, subject to the approval of the Court, to extend the time
 22 for Plaintiff to file Plaintiff’s Motion for Summary Judgment or Remand to July 1,
 23 2016; and that Defendant shall have until August 1, 2016, to file her opposition, if
 24 any is forthcoming. Any reply by plaintiff will be due August 15, 2015.

1 Despite Counsel for plaintiff anticipating the prior request for an extension
2 to be his last, Counsel requires more time as a result of the impact of unanticipated
3 medical procedures to treat his spouses' terminal illness, including the unfortunate
4 news on June 2, 2016 of a second independent cancer diagnosis of multiple
5 myeloma in addition to the existing stage 4 breast cancer. Counsel for plaintiff
6 does not anticipate this extraordinary request for more time to become the rule and
7 recognizes it is the exception and sincerely apologizes to the court for any
8 inconvenience this may have had upon it or its staff.

9
10 DATE: June 22, 2016

Respectfully submitted,

LAW OFFICES OF LAWRENCE D. ROHLFING

/s/ Steven G. Rosales

BY: _____

Steven G. Rosales
Attorney for plaintiff

11
12
13
14
15 DATED: June 22, 2016

BRIAN J. STRETCH
United States Attorney

16
17
18 */S/- Henry Chi

19 _____

Henry Chi
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 July 1, 2016, in which to file Plaintiff's Motion for Summary
3 Judgment or Remand; Defendant may have an extension of time to August 1, 2016
4 to file her opposition, if any is forthcoming. Any reply by plaintiff will be due
5 August 15, 2016.

6 IT IS SO ORDERED.

7 DATE: June 28, 2016



8 THE HONORABLE MARIA ELENA JAMES
9 UNITED STATES MAGISTRATE JUDGE

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26