1	Denise Bourgeois Haley		
2	Attorney at Law: 143709 12631 East Imperial Highway, Suite C-115 Santa Fe Springs, CA 90670 Tel: (562)437-7006 Fax: (562)432-2935 E-Mail: rohlfing.office@rohlfinglaw.com Attorneys for Plaintiff SHAWN TUCKER		
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6	SHAWN TUCKER		
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9	UNITED STATES DISTRICT COURT		
10	NORTHERN USDC OF CALIF	FORNIA RONALD V. DELLUMS	
11			
12	SHAWN TUCKER) Case No.: 3:16-cv-06839-HSG	
13	Plaintiff, v.) STIPULATION TO EXTEND TIME) TO FILE MOTION FOR SUMMARY) JUDGMENT	
14 15	NANCY A. BERRYHILL, Acting Commissioner of Social Security.) (FIRST REQUEST)	
	Defendant.))	
16))	
17			
18	Plaintiff Shawn Tucker and Defen	dant Carolyn W. Colvin, Acting	
19	Plaintiff Shawn Tucker and Defendant Carolyn W. Colvin, Acting Commissioner of Social Security, through their undersigned attorneys, stipulate		
20	Commissioner of Social Security, through their undersigned attorneys, stipulate,		
21	subject to this court's approval, to extend the time by 45 days from May 10, 2017		
22	to June 24, 2017 for Plaintiff to file a Motion for Summary Judgment, with all		
23	other dates in the Court's Order Concerning Review Of Social Security Cases		
24	extended accordingly. This is Plaintiff's first request for an extension. This request		
25	is made at the request of Plaintiff's counsel to allow additional time to fully		
26	research the issues presented. Counsel ha	as multiple overdue motions due to the	

1	caseload resulting from the loss of an attorney in June 2016 and the failure of both	
2	replacements. Counsel's caseload is complicated by an extended administrative	
3	hearing schedule as well. Counsel is working diligently but can only do one motion	
4	or hearing at a time. Counsel's firm has hired to new associates who are assisting	
5	with the briefing; however, it will take time to normalize. Counsel seeks this	
6	continuance in good faith and under these rather extraordinary circumstances.	
7	DATE: May 17, 2017 Respectfully submitted,	
8	LAWRENCE D. ROHLFING	
9	/S/ Denise Bourgeois Haley	
10	BY: Denise Bourgeois Haley	
11	Attorney for plaintiff Mr. Shawn Tucker	
12		
13	DATE: May 17, 2017 BRIAN STRETCH	
14	Acting United States Attorney	
15	/S/ Daniel P. Talbert	
16	BY:	
17	Daniel P. Talbert Special Assistant United States Attorney	
18	Attorneys for defendant Nancy A. Berryhill *authorized by e-mail	
19		
20	DATED: May 19, 2017	
21	IT IS SO ORDERED: Haywool & July 1	
22	UNITED STATES DISTRCT JUDGE	
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