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5 Attorneys for Plaintiff  
 6 BETTY UNCANGCO

7  
 8 **UNITED STATES DISTRICT COURT**  
 9 **DISTRICT OF NEVADA**

10  
 11  
 12 BETTY UNCANGCO, ) Case No.: 2:14-cv-00994-APG-CWH  
 13 Plaintiff, )  
 14 vs. ) UNOPPOSED MOTION TO AMEND  
 ) AND EXTEND BRIEFING  
 15 CAROLYN W. COLVIN, Acting ) SCHEDULE  
 )  
 16 Commissioner of Social Security, )  
 )  
 17 Defendant )  
 18 )

19  
 20 Plaintiff Betty Uncangco (“Plaintiff”) and defendant Carolyn Colvin,  
 21 Commissioner of Social Security (“Defendant”), through their undersigned counsel  
 22 of record, hereby stipulate, subject to the approval of the Court, to extend the time  
 23 for Plaintiff to file Plaintiff’s Motion for Reversal and/or Remand to January 23,  
 24 2015; and that Defendant shall have until February 23, 2015, to file her opposition,  
 25 if any is forthcoming. Any reply by plaintiff will be due March 9, 2015.  
 26

1 An extension of time is needed because Plaintiff's Counsel's Spouse  
2 undergoes chemotherapy treatment for her Stage IV breast cancer which  
3 metastasized initially to her liver and continues to progress there and in her lungs,  
4 throat, and spine which required recent hospitalization to treat. Counsel requires the  
5 additional time to file the Motion for Reversal and/or Remand to allow him to  
6 devote the appropriate time to assist his Spouse and his two elementary school aged  
7 children through this obviously stressful experience. Counsel sincerely apologizes  
8 to the court for any inconvenience this may have had upon it or its staff.

9 Counsel for defendant has indicated, via e-mail, that this motion to extend  
10 the time to file is not opposed.

11 DATE: December 1, 2014, Respectfully submitted,

12 ROHLFING & KALAGIAN, LLP

13 /s/ *Marc V. Kalagian*

14 BY: \_\_\_\_\_  
15 Marc V. Kalagian  
16 Attorney for plaintiff BETTY UNCANGCO

17 ORDER

18 IT IS SO ORDERED.

19   
20 \_\_\_\_\_  
21 UNITED STATES MAGISTRATE JUDGE

22 DATED: December 3, 2014