

1 Marc V. Kalagian  
 Attorney at Law: 4460  
 2 Law Offices of Rohlfing & Kalagian, LLP  
 211 East Ocean Boulevard, Suite 420  
 3 Long Beach, CA 90802  
 Tel.: (562)437-7006  
 4 Fax: (562)432-2935  
 E-mail rohlfig.kalagian@rksslaw.com

5 Attorneys for Plaintiff  
 6 DEBRA A. SCHULTZ

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

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DEBRA A. SCHULTZ,	)	Case No.: 2:15-cv-00804-APG-PAL
	)	
Plaintiff,	)	STIPULATION TO EXTEND
	)	BRIEFING SCHEDULE (First
vs.	)	Request)
	)	
	)	
CAROLYN W. COLVIN, Acting	)	
Commissioner of Social Security,	)	
Defendant		

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Plaintiff Debra A. Schultz (“Plaintiff”) and defendant Carolyn Colvin, Acting Commissioner of Social Security (“Defendant”), through their undersigned counsel of record, hereby stipulate, subject to the approval of the Court, to extend the time for Plaintiff to file Plaintiff’s Motion for Reversal and/or Remand to May 6, 2016; and that Defendant shall have until June 6, 2016, to file her opposition, if any is forthcoming. Any reply by plaintiff will be due June 27, 2016.

1 An extension of time for plaintiff is needed in order to properly prepare  
2 plaintiff's motion addressing the legal issues within the administrative record in  
3 this matter. Counsel sincerely apologizes to the court for any inconvenience this  
4 may have had upon it or its staff.

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6  
7 DATE: March 22, 2016,

Respectfully submitted,

8 ROHLFING & KALAGIAN, LLP

9 */s/ Marc V. Kalagian*

10 BY: \_\_\_\_\_

Marc V. Kalagian

11 Attorney for plaintiff DEBRA A. SCHULTZ

12  
13 DATED: March 22, 2016

Daniel G. Bogden

14 United States Attorney

15 \*/S/ April A. Alongi

16  
17 \_\_\_\_\_  
April A. Alongi

18 Special Assistant United States Attorney

Attorney for Defendant

19 [\*Via email authorization]

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21 IT IS SO ORDERED:

22  
23 *Jerry A. Feen*  
24 \_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE

25 DATED: March 25, 2016