

1 As the Court is aware, after a 5 year battle with terminal stage 4 cancer
2 Plaintiff's Counsel's Spouse of the associate, who this matter is assigned to, passed
3 away on September 30, 2016. The aftermath of this traumatic event on both
4 Counsel and his 9 year old son and 7 year old daughter was immeasurable.
5 Compounding the impact of this loss is the fact that Counsel's spouse was a former
6 employee at Counsel's Law Firm and her death was far reaching in its impact on
7 Counsel's professional life as well. Due to the death, the subsequent holiday
8 period, and the need to find a permanent caregiver and the required time to
9 acclimate his children to that presence during his absence to meet his professional
10 obligations, Counsel requires the additional time to prepare and file her motion for
11 summary judgment.

12 Counsel for plaintiff does not anticipate this extraordinary request for more
13 time to become the rule and recognizes it is the extraordinary exception and
14 sincerely apologizes to the court for any inconvenience this may have had upon it
15 or its staff.

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DATE: March 23, 2017

Respectfully submitted,
ROHLFING & KALAGIAN, LLP

/s/ Marc V. Kalagian

BY: _____
Marc V. Kalagian
Attorney for plaintiff Mr. Thomas M. Bartz

DATE: March 23, 2017

Daniel G. Bogden
United States Attorney

/s/ Urmila R. Taylor

BY: _____
Urmila R. Taylor
Special Assistant United States Attorney
Attorneys for defendant Nancy A. Berryhill
[*authorized by e-mail]

DATED: March 24, 2017



IT IS SO ORDERED:

UNITED STATES DISTRICT JUDGE

CERTIFICATE OF SERVICE
FOR CASE NUMBER 2:16-CV-02073-RFB-PAL

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I hereby certify that I electronically filed the foregoing with the Clerk of the Court for this court by using the CM/ECF system on March 23, 2017.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Marc V. Kalagian

Marc V. Kalagian
Attorneys for Plaintiff