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11 Attorneys for Defendant

12 **UNITED STATES DISTRICT COURT**
 13 **DISTRICT OF NEVADA**

14 TAMMY A. GILL,

15 Plaintiff

16 v.

17 CAROLYN W. COLVIN, Acting
 Commissioner of Social Security,

18 Defendant.
 19

) Case No: 2:15-cv-00553-JCM-CWH

)
)
) **JOINT STIPULATION FOR EXTENSION**
) **OF TIME TO FILE DEFENDANT’S**
) **CROSS-MOTION TO AFFIRM**

) **(First Request)**

20 The parties request to extend the time by thirty-one days from September 11, 2015 to
 21 October 13, 2015 for Defendant Carolyn W. Colvin, Acting Commissioner of Social Security
 22 (the Commissioner), to file her Cross-Motion To Affirm. This is the Commissioner’s first
 23 request for an extension.¹

24
 25 ¹ The Court granted the Commissioner an extension prior to filing her Answer because the
 26 agency component responsible for producing the Certified Administrative Record had not yet
 provided it. This occurred prior to briefing.

1 There is good cause because the Commissioner's counsel is experiencing a very heavy
2 workload and was attending full-day in-office training for two days and then was on approved
3 leave. Further, counsel had a number of deadlines this week, including another District Court
4 brief, and two more briefs due next week. The Commissioner needs additional time to respond
5 to the issues raised in Plaintiff's Motion For Reversal. Plaintiff has no objection.
6

7 Respectfully submitted,

8 Date: September 11, 2015

9 By: /s/* Marc V. Kalagian
10 MARC V. KALAGIAN
*by email authorization on 9/10/15

11 Attorneys for Plaintiff

12 Date: September 11, 2015

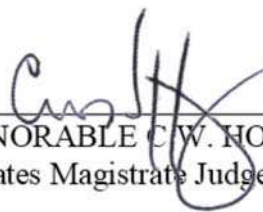
13 DANIEL G. BOGDEN
14 United States Attorney
BLAINE T. WELSH
Chief, Civil Division

15 By: /s/ April A. Alongi
16 APRIL A. ALONGI
Special Assistant United States Attorney

17 Attorneys for Defendant
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21 IT IS SO ORDERED.
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24 DATE: September 14, 2015

25 
THE HONORABLE C.W. HOFFMAN, JR.
United States Magistrate Judge
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DEFENDANT'S CERTIFICATE OF SERVICE

I certify that I caused a copy of the Joint Stipulation For Extension Of Time To File Defendant's Cross-Motion To Affirm to be served, via CM/ECF notification, on:

MARC V. KALAGIAN
Law Offices of Rohlfing & Kalagian, LLP
211 East Ocean Boulevard, Suite 420
Long Beach, California 90802
Marc.kalagian@rksslaw.com

Date: September 11, 2015

DANIEL G. BOGDEN
United States Attorney
BLAINE T. WELSH
Chief, Civil Division

By: /s/ April A. Alongi
APRIL A. ALONGI
Special Assistant United States Attorney

Attorneys for Defendant