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11 Attorneys for Defendant

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

13 TAMMY A. GILL,

15 Plaintiff

16 v.

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

19 Defendant.

) Case No: 2:15-cv-00553-JCM-CWH
)
)
) **JOINT STIPULATION FOR EXTENSION**
) **OF TIME TO FILE DEFENDANT’S**
) **CROSS-MOTION TO AFFIRM**
)
) **(Second Request)**

20 The parties request to extend the time by sixty days from October 13, 2015, *nunc pro*
 21 *tunc*, to December 14, 2015 for Defendant Carolyn W. Colvin, Acting Commissioner of Social
 22 Security (the Commissioner), to file her Cross-Motion To Affirm. This is the Commissioner’s
 23 second request for an extension to file her Cross-Motion.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 The extension is necessary because the previously assigned attorney for Defendant has
2 unexpectedly been on leave due to a medical emergency. As a result of counsel's unexpected
3 and extended absence, Defendant inadvertently failed to file her Cross-Motion by the
4 October 13, 2015 deadline. After discovering this, Defendant has had to reassign this case to
5 another attorney. Therefore, Defendant needs additional time for newly assigned counsel to take
6 over the case, become familiar with the issues, and complete briefing.

7 Plaintiff has no objection. Defendant apologizes for any inconvenience resulting from the
8 delay.

9 Respectfully submitted,

10 Date: November 16, 2015

By: /s/* Marc V. Kalagian
MARC V. KALAGIAN
*by email authorization on 11/16/15

11
12 Attorneys for Plaintiff

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14 Date: November 13, 2015

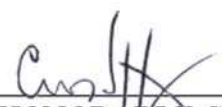
DANIEL G. BOGDEN
United States Attorney
BLAINE T. WELSH
Chief, Civil Division

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16
17 By: /s/ Susan L. Smith
SUSAN L. SMITH
Special Assistant United States Attorney

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19 Attorneys for Defendant

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21 IT IS SO ORDERED.

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24 DATE: November 17, 2015



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
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Long Beach, California 90802
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Date: November 16, 2015

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

By: /s/ Susan L. Smith
SUSAN L. SMITH
Special Assistant United States Attorney

Attorneys for Defendant