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10 UNITED STATES DISTRICT COURT  
11 DISTRICT OF NEVADA

12 TAMMY A. GILL,  
13

14 Plaintiff,

15 v.

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

17 Defendant.  
18

No. 2:15-cv-00553-JCM-CWH

STIPULATION AND PROPOSED ORDER FOR  
EXTENSION

(THIRD REQUEST)

19 The parties request to extend the time by three days from December 14, 2015, to  
20 December 17, 2015, for Defendant Carolyn W. Colvin, Acting Commissioner of Social Security  
21 (the Commissioner), to file her Cross-Motion to Affirm. This is the Commissioner's third request  
22 for an extension.

23 There is good cause for this extension. The Commissioner has previously requested and  
24 received two extensions of time to file her responsive brief in this matter. Since the filing of  
25 Plaintiff's motion, scheduling and workload commitments led to the assignment and reassignment  
26 of this case to three different attorneys for the Commissioner. The undersigned attorney for the  
27 Commissioner learned of this matter for the first time this morning, and agreed to accept  
28 reassignment of the case, resolve the scheduling issue, and prepare and submit the

1 Commissioner's Motion to Affirm as promptly as possible. The undersigned attorney for the  
2 Commissioner has made this matter his top priority and will attempt to file his Motion to Affirm  
3 either today, December 15, 2015, or tomorrow, December 16, 2015, but at the latest by Thursday,  
4 December 17, 2015. The undersigned attorney for the Commissioner apologizes to the Court and  
5 to opposing counsel for making this additional request for additional time, and for the failure to  
6 file the Motion to Affirm yesterday as required by this Court's prior order. Counsel for Plaintiff  
7 does not oppose this request, and joins in this stipulation to grant the Commissioner a third  
8 extension of three days.

9 Respectfully submitted,

10 DANIEL G. BOGDEN  
11 United States Attorney

12 DATE: December 15, 2015

By s/ Daniel P. Talbert  
13 DANIEL P. TALBERT  
14 Special Assistant United States Attorney

15 Attorneys for Defendant

16 By s/ Marc V. Kalagian  
17 MARC V. KALAGIAN  
\*by email authorization December 15, 2015

18 Attorney for Plaintiff

19  
20 IT IS SO ORDERED.

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22  
23 DATE: December 16, 2015

  
24 \_\_\_\_\_  
25 THE HONORABLE C. W. HOFFMAN, JR.  
26 United States Magistrate Judge  
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