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12 Attorneys for Defendant

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

<p>14 FRANCES E. SWARTZ, 15 Plaintiff 16 v. 17 CAROLYN W. COLVIN, Acting 18 Commissioner of Social Security, 19 Defendant.</p>	<p>) Case No: 2:15-cv-01811-JAD-PAL))) JOINT STIPULATION FOR EXTENSION) OF TIME TO FILE DEFENDANT'S) CROSS-MOTION TO AFFIRM))))</p>
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1 Plaintiff Frances E. Swartz (Plaintiff) and Defendant Carolyn W. Colvin, Acting
2 Commissioner of Social Security (the Commissioner), stipulate, with the approval of this Court,
3 to an extension of time to file Defendant’s Cross-Motion To Affirm by thirty-two days from May
4 26, 2016 to June 27, 2016, with all other dates in this Court’s Scheduling Order extended
5 accordingly. This is the Commissioner’s first request for an extension.¹

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16 There is good cause because, since Plaintiff filed her Motion For Reversal And Remand,
17 the Commissioner’s counsel has been handling a large number of District Court and Ninth
18 Circuit cases in addition to this one, with eleven briefs—one in the Ninth Circuit—due within the
19 next thirty days. Additionally, counsel has been had numerous other deadlines, including a
20 motion to compel in a discovery dispute, a settlement memorandum in an employment case, and
21 multiple mentoring and reviewing duties in the Office of the General Counsel. As result, the
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24 ¹ This Court granted the Commissioner an extension of time prior to answering Plaintiff’s
25 Complaint For Judicial Review because the Social Security Administration component
26 responsible for producing the certified administrative record had not yet provided it to counsel.
That extension occurred prior to briefing.

1 Commissioner needs additional time to properly respond to the issues Plaintiff raised in her
2 motion. Plaintiff has no objection.

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4 Date: May 26, 2016

Respectfully submitted,
By: /s/* Richard E. Donaldson
RICHARD E. DONALDSON
*by email authorization on 5/26/16

Attorney for Plaintiff

8 Date: May 26, 2016


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

IT IS SO ORDERED.

22 DATE: May 31, 2016


THE HONORABLE PEGGY A. LEEN
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:

RICHARD E. DONALDSON
Esquire
gunlawyer@aol.com

Date: May 26, 2016

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