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 RICHARD E. DONALDSON, ESQ.
 2 Nevada Bar No. 1095
 2300 West Sahara Ave., Suite 800
 3 Las Vegas, NV 89102
 Attorney for Plaintiff
 4

5 UNITED STATES DISTRICT COURT
 6 DISTRICT OF NEVADA

7 * * * * *

8 TERESA MORALES)
 9 Plaintiff,)

10 vs.)

11) CIVIL ACTION NO. 2:16-cv-00230 JAD-NJK

12 CAROLYN COLVIN)
 13 COMMISSIONER OF SOCIAL)
 SOCIAL SECURITY)

14 Defendant.)

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 16 **STIPULATION FOR EXTENSION OF TIME TO FILE PLAINTIFF'S REPLY
 TO DEFENDANT'S CROSS MOTION TO AFFIRM**

17 **(First Request)**

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 19 IT IS HEREBY STIPULATED, by and between the parties through their respective
 20 counsel, that the Plaintiff, TERESA MORALES, shall have an additional thirty (30) days, to
 21 and including Thursday, October 27, 2016 in which to file a **REPLY TO DEFENDANT'S**
 22 **CROSS MOTION TO AFFIRM** pursuant to this Court's Order Concerning Review of
 23 Social Security Cases, and that the schedule for briefing by the Defendant, Commissioner of
 24 Social Security, and other corresponding deadlines be adjusted accordingly.

25 The extension of time is necessary because Counsel, a solo practitioner and solely
 26 responsible for the preparation this Reply, has not been able to adequately brief this case in
 27 the allotted time. The administrative record is detailed, and involves complex issues
 28 requiring additional time to research. Counsel has also had an unprecedented number of

1 critical deadlines in other matters, and undersigned Counsel has not been able to meet all of
2 these deadlines in a timely manner.

3 This is the first request for an extension of time.

4 Respectfully submitted,

5 Date: September 26, 2016

RICHARD E. DONALDSON, ESQ., CHTD.

6 /s/ Richard E. Donaldson
Richard E. Donaldson
7 Nevada Bar No. 1095
2300 West Sahara Ave., Suite 800
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Attorney for Plaintiff
9

10 Date: September 26, 2016

DANIEL G. BOGDEN
United States Attorney
11 BLAINE T. WELSH
Chief, Civil Division
12

By: /s/ April A. Alongi
13 APRIL A. ALONGI
Special Assistant United States Attorney
14 Attorneys for Defendant
15

16 IT IS SO ORDERED.

17 Date: September 27, 2016


18 THE HONORABLE NANCY J. KOPPE
Magistrate Judge
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