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Atorneys for Plaintiff
MATT G. PRINES

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

12 MATT G. PRINES) Case No.: 2:16-cv-01457-JCM-PAL
13 Plaintiff,)
14 v.) STIPULATION TO EXTEND TIME
15 NANCY A. BERRYHILL, Acting) TO FILE MOTION FOR REVERSAL
16 Commissioner of Social Security.) AND/OR REMAND
Defendant.) (THIRD REQUEST)
)
)
)

19 Plaintiff Matt G. Prines and Defendant Nancy A. Berryhill, Acting
20 Commissioner of Social Security, through their undersigned attorneys, stipulate,
21 subject to this court's approval, to extend the time from April 10, 2017 to April 17,
22 2017 for Plaintiff to file Plaintiff's Motion for Reversal and/or Remand; and that
23 Defendant shall have until May 17, 2017, to file her opposition, if any is
24 forthcoming. Any reply by plaintiff will be due June 6, 2017. This is Plaintiff's
25 third request.

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1 Counsel has recently reassigned this case internally in order to avoid further
2 delay in this matter. An extension of time is needed as the spouse of the associate
3 in Counsel's firm who this matter was previous assigned recently passed away.
4 Due to the sensitive nature of the situation, Counsel has previously refrained from
5 reassigning the matter.

6 The matter has now been reassigned and Counsel assures the Court that the
7 Motion will be filed on or before April 17, 2017. Counsel sincerely apologizes to
8 the court for any inconvenience this may have had upon it or its staff.

10 DATE: April 10, 2017 Respectfully submitted,
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13 BY: _____
Cyrus Safa
Attorney for plaintiff Mr. Matt G. Prines, Jr.

16 DATE: April 10, 2017 Daniel G. Bogden
United States Attorney

24 | DATED: April 14, 2017

IT IS SO ORDERED:

UNITED STATES MAGISTRATE JUDGE

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**CERTIFICATE OF SERVICE
FOR CASE NUMBER 2:16-CV-01457-JCM-PAL**
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I hereby certify that I electronically filed the foregoing with the Clerk of the
Court for this court by using the CM/ECF system on April 10, 2017.

I certify that all participants in the case are registered CM/ECF users and
that service will be accomplished by the CM/ECF system.

/s/ Cyrus Safa

Cyrus Safa
Attorneys for Plaintiff

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