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14 Attorneys for Defendant

15 **UNITED STATES DISTRICT COURT**  
 16 **DISTRICT OF NEVADA**

17 MATT G. PRINES,	)	Case No: 2:16-cv-01457-JCM-PAL
	)	
18 Plaintiff	)	
	)	<b>JOINT STIPULATION FOR EXTENSION</b>
19 v.	)	<b>OF TIME TO FILE DEFENDANT'S</b>
	)	<b>CROSS-MOTION TO AFFIRM</b>
20 NANCY A. BERRYHILL, Acting	)	
Commissioner of Social Security, <sup>1</sup>	)	<b>(First Request)</b>
	)	
21 Defendant.	)	
	)	
22 _____	)	

24 <sup>1</sup> Nancy A. Berryhill is now the Acting Commissioner of Social Security. Pursuant to Rule 25(d)  
 25 of the Federal Rules of Civil Procedure, Nancy A. Berryhill should be substituted for Carolyn W.  
 26 Colvin as the defendant in this suit. No further action needs to be taken to continue this case by  
 reason of the last sentence of section 205(g) of the Social Security Act. 42 U.S.C. § 405(g).

1 Plaintiff Matt G. Prines (Plaintiff) and Defendant Nancy A. Berryhill, Acting  
2 Commissioner of Social Security (the Commissioner), stipulate, with the approval of this Court,  
3 to an extension of time for the Commissioner to file her Cross-Motion To Affirm by thirty days  
4 from May 17, 2017 to June 16, 2017, with all other dates in this Court's Scheduling Order extended  
5 accordingly. This is the Commissioner's first request for an extension.

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19 There is good cause because, since Plaintiff filed his Motion For Reversal And/Or Remand  
20 (Plaintiff's Motion), counsel has been handling a large number of District Court cases in addition  
21 to this one, with two briefs due this week and a dispositive motion in an employment law case due  
22 today. Additionally, the Commissioner's counsel was out of the office on approved leave for  
23 nearly two weeks this month. Further, counsel has had numerous other deadlines in the past month,  
24 including other District Court briefs, a settlement memorandum, and other motions in an  
25 administrative matter. As a result, the Commissioner needs additional time to properly respond to  
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1 the issues Plaintiff raised in his Motion. Plaintiff has no objection.

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Respectfully submitted,

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Date: May 22, 2017

GERALD M. WELT  
Attorney at Law

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By: /s/\* Cyrus Safa  
CYRUS SAFA  
Attorney at Law  
\*by email authorization on 5/22/17

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Attorneys for Plaintiff

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Date: May 22, 2017

STEVEN W. MYHRE  
Acting United States Attorney  
BLAINE T. WELSH  
Chief, Civil Division

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By: /s/ April A. Alongi  
APRIL A. ALONGI  
Special Assistant United States Attorney

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Attorneys for Defendant

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IT IS SO ORDERED.

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DATE: May 23, 2017

  
THE HONORABLE PEGGY A. LEEN  
United States Magistrate Judge

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**DEFENDANT'S CERTIFICATE OF SERVICE**

I certify that I caused the Joint Stipulation For Extension Of Time To File Defendant's Cross-Motion To Affirm (First Request) to be served, via CM/ECF notice, on:

CYRUS SAFA  
Attorney at Law  
rohlfing.office@rohlfinglaw.com

Date: May 22, 2017

STEVEN W. MYHRE  
Acting 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