Watanabe v. Colvin Dpc. 19

Marc V. Kalagian Attorney at Law: 4460 211 East Ocean Boulevard, Suite 420 Long Beach, CA 90802 3 Tel: (562)437-7006 4 Fax: (562)432-2935 E-Mail: rohlfing.kalagian@rksslaw.com 5 Attorneys for Plaintiff THOMÁS I. WATANABE 6 7 8 UNITED STATES DISTRICT COURT 9 **DISTRICT OF NEVADA** 10 11 THOMAS I. WATANABE Case No.: 2:16-cv-01688-JAD-PAL 12 Plaintiff, STIPULATION TO EXTEND TIME 13 TO FILE MOTION FOR REVERSAL v. AND/OR REMAND 14 NANCY A. BERRYHILL, Acting Commissioner of Social Security. (FIRST REQUEST) 15 Defendant. 16 17 18 Plaintiff Thomas I. Watanabe ("Plaintiff") and defendant Nancy A. 19 Berryhill, Acting Commissioner of Social Security ("Defendant"), through their 20 undersigned counsel of record, hereby stipulate, subject to the approval of the 21 Court, to extend the time for Plaintiff to file Plaintiff's Motion for Reversal and/or 22 Remand to April 13, 2017; and that Defendant shall have 30 days or until May 15, 23 2017, to file her opposition, if any is forthcoming. Any reply by plaintiff will be 24 due June 5, 2017. 25 /// 26

As the Court is aware, after a 5 year battle with terminal stage 4 cancer

Plaintiff's Counsel's Spouse of the associate, who this matter is assigned to, passed away on September 30, 2016. The aftermath of this traumatic event on both

Counsel and his 9 year old son and 7 year old daughter was immeasurable.

Compounding the impact of this loss is the fact that Counsel's spouse was a former employee at Counsel's Law Firm and her death was far reaching in its impact on

Counsel's professional life as well. Due to the death, the subsequent holiday period, and the need to find a permanent caregiver and the required time to acclimate his children to that presence during his absence to meet his professional obligations, Counsel requires the additional time to prepare and file her motion for summary judgment.

Counsel for plaintiff does not anticipate this extraordinary request for more time to become the rule and recognizes it is the extraordinary exception and sincerely apologizes to the court for any inconvenience this may have had upon it or its staff.

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1	DATE: March 23, 2017	Respectfully submitted,
2		ROHLFING & KALAGIAN, LLP
3		/s/ Mare V. Kalagian
4		BY: Marc V. Kalagian
5		Attorney for plaintiff Mr. Thomas I. Watanabe
6		
7	DATE: March 23, 2017	Daniel G. Bogden
8		Daniel G. Bogden United States Attorney
9		
10		/S/Marcelo N. Illarmo
11		BY:
12		Marcelo N. Illarmo Special Assistant United States Attorney Attorneys for defendant Nancy A. Berryhill
13		Attorneys for defendant Nancy A. Berryhill *authorized by e-mail
14		
15	DATED: March 27, 2017	
16	IT IS SO ORDERED:	Jun a See
17		UNITED STATES MAGISTRATE JUDGE
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CERTIFICATE OF SERVICE FOR CASE NUMBER 2:16-CV-01688-JAD-PAL

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 March 23, 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/ Marc V. Kalagian

Marc V. Kalagian Attorneys for Plaintiff