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15 Attorneys for Defendant

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

18 THERESA M. WEESNER,)
 19)
 Plaintiff,)
 20)
 v.)
 21)
 CAROLYN W. COLVIN,)
 22 Acting Commissioner of Social Security,)
 23 Defendant.)

) Case No. 2:16-cv-02018-RFB-PAL
)
) **JOINT STIPULATION AND [PROPOSED]**
) **ORDER FOR EXTENSION OF TIME TO FILE**
) **DEFENDANT'S NOTICE OF VOLUNTARY**
) **REMAND OF THE CASE OR CROSS-**
) **MOTION TO AFFIRM**
)
) **(First Extension Request)**

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1 Plaintiff Theresa M. Weesner (Plaintiff) and Defendant Carolyn W. Colvin, Acting
2 Commissioner of Social Security (Defendant), stipulate, with the approval of this Court, to an
3 extension of time to file Defendant's Notice Of Voluntary Remand Of The Case or Cross-Motion To
4 Affirm by thirty days from the current deadline of January 6, 2017 to **February 6, 2017**, with all other
5 dates in this Court's Order Concerning Review Of Social Security Cases extended accordingly. This
6 is Defendant's first request for an extension.

7
8 Good cause exists to grant Defendant's request for extension. Defendant respectfully requests
9 additional time to adequately review the record, assess and evaluate Plaintiff's arguments. Good cause
10 also exists because counsel for Defendant (Counsel) was on scheduled leave for the holidays and is
11 also expected to be out of the office from December 30, 2016 to January 3, 2017. Counsel needs
12 additional time due to workload issues and current scheduling conflicts to properly respond to the
13 issues Plaintiff raised in her Motion.

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1 Defendant makes this request in good faith with no intention to unduly delay the proceedings.
2 Plaintiff has no objection and has stipulated to the requested relief.

3 Respectfully submitted this 29th day of December 2016,

4
5 Date: December 29, 2016

6 By: /s/*Howard Olinsky
7 Howard D. Olinsky
8 *by email authorization on 12/27/16
9 Attorney for Plaintiff

10 Date: December 29, 2016

11 DANIEL G. BOGDEN
12 United States Attorney
13 HOLLY A. VANCE
14 Assistant United States Attorney

15 By: /s/ Roya Massoumi
16 ROYA MASSOUMI
17 Special Assistant United States Attorney


18 Of Counsel:
19 TINA L. NAICKER
20 Assistant Regional Counsel
21 Attorneys for Defendant

22 **[PROPOSED] ORDER**

23 For good cause appearing therein, IT IS HEREBY ORDERED that the Joint Stipulation for
24 Extension of Time to file Defendant's Notice Of Voluntary Remand Of The Case or Cross-Motion To
25 Affirm is GRANTED. Defendant shall file its response to Plaintiff's Motion on or before **February 6,**
26 **2017.** All other deadlines shall be extended accordingly.

IT IS SO ORDERED.

24 Dated: December 30, 2016

25 
26 THE HONORABLE PEGGY A. LEEN
United States Magistrate Judge

1 **CERTIFICATE OF SERVICE**

2 I, ROYA MASSOUMI, certify that the following individual was served with a copy of the
3 **JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO FILE**
4 **DEFENDANT’S NOTICE OF VOLUNTARY REMAND OF THE CASE OR CROSS-**
5 **MOTION TO AFFIRM** on the date and via the method of service identified below:

6 **CM/ECF:**

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23
24 Respectfully submitted this 29th day of December 2016,

25
26 */s/ Roya Massoumi*

ROYA MASSOUMI
Special Assistant United States Attorney

OF COUNSEL:
TINA L. NAICKER
Assistant Regional Counsel, Region IX