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11 Attorneys for Defendant

12
13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 THERESA M. WEESNER,

16 Plaintiff,

17 v.

18 NANCY A. BERRYHILL,
Acting Commissioner of Social Security,

19 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**

) **(Third Extension Request)**

20
 21 Plaintiff Theresa M. Weesner (Plaintiff) and Defendant Carolyn W. Colvin, Acting
 22 Commissioner of Social Security (Defendant), stipulate, with the approval of this Court, to an
 23 extension of time to file Defendant’s Notice Of Voluntary Remand Of The Case or Cross-Motion To
 24 Affirm by one week from the current deadline of February 20, 2017 to **February 27, 2017**, with all
 25
 26

1 other dates in this Court's Order Concerning Review Of Social Security Cases extended accordingly.

2 This is Defendant's third request for an extension.

3 Good cause exists to grant Defendant's request for extension. Counsel needs additional time to
4 make time for the agency's review process for new attorneys, which requires additional levels of
5 review. Due to scheduling conflicts and the upcoming President's Day holiday, Counsel will not be
6 able to complete the agency's review process in time for the current deadline.

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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 17th day of February 2017,

4
5 Date: February 17, 2017

6 By: /s/*Howard Olinsky
7 Howard D. Olinsky
*by email authorization on 2/17/17
Attorney for Plaintiff

8 Date: February 17, 2017

9 DANIEL G. BOGDEN
10 United States Attorney
HOLLY A. VANCE
Assistant United States Attorney


11 By: /s/Tina L. Naicker
12 TINA L. NAICKER
13 Special Assistant United States Attorney

14 **[PROPOSED] ORDER**

15 For good cause appearing therein, IT IS HEREBY ORDERED that the Joint Stipulation for
16 Extension of Time to file Defendant's Notice Of Voluntary Remand Of The Case or Cross-Motion To
17 Affirm is GRANTED. Defendant shall file its response to Plaintiff's Motion on or before **February**
18 **27, 2017**. All other deadlines shall be extended accordingly.

19 **IT IS SO ORDERED.**

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22 Dated: February 22, 2017

23 
24 THE HONORABLE PEGGY A. LEEN
25 United States Magistrate Judge
26

1 **CERTIFICATE OF SERVICE**

2 I, TINA L. NAICKER, 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:**

7
8 Howard D. Olinsky
9 Olinsky Law Group
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17 Hal Taylor
18 223 Marsh Avenue
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23
24 Respectfully submitted this 17th day of February 2017,
25
26

/s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant United States Attorney
Attorney for Defendant