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 8 Attorneys for Plaintiff  
 9 MICHAEL SHANE

10 **UNITED STATES DISTRICT COURT**  
 11 **DISTRICT OF NEVADA**

12 MICHAEL SHANE	)	Case No.: 2:16-cv-02263-JAD-CWH
	)	
13 Plaintiff,	)	STIPULATION TO EXTEND TIME
	)	TO FILE MOTION FOR REMAND
14 v.	)	AND/OR REVERSAL
	)	
15 NANCY A. BERRYHILL, Acting	)	(FIRST REQUEST)
Commissioner of Social Security.	)	
	)	
16 Defendant.	)	
	)	
17 _____	)	

18  
 19 Plaintiff Michael Shane (“Plaintiff”) and defendant Nancy A. Berryhill,  
 20 Acting Commissioner of Social Security (“Defendant”), through their undersigned  
 21 counsel of record, hereby stipulate, subject to the approval of the Court, to extend  
 22 the time for Plaintiff to file Plaintiff’s Motion for Reversal and/or Remand to  
 23 March 9, 2017; and that Defendant shall have 30 days or until April 10, 2017, to  
 24 file her opposition, if any is forthcoming. Any reply by plaintiff will be due May  
 25 1, 2017.

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1 This is Plaintiff's first request for an extension. The Administrative Record  
2 provided to Plaintiff's counsel is unable to be opened and read. Both parties are  
3 working to correct this matter. Counsel sincerely apologizes to the court for any  
4 inconvenience this may have had upon it or its staff.

5  
6 DATE: January 23, 2017

Respectfully submitted,

7 ROHLFING & KALAGIAN, LLP

8 /s/ *Marc V. Kalagian*

9 BY: \_\_\_\_\_

Marc V. Kalagian

10 Attorney for plaintiff Mr. Michael Shane

11  
12 DATE: January 23, 2017

Daniel G. Bogden

13 United States Attorney

14 /s/ *Roya Massoumi*

15 BY: \_\_\_\_\_

Roya Massoumi

16 Special Assistant United States Attorney

17 Attorneys for defendant Carolyn W. Colvin

|\*authorized by e-mail|

18  
19 DATED: January 24, 2017

20 IT IS SO ORDERED: \_\_\_\_\_

21 UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**  
2 **FOR CASE NUMBER 2:16-CV-02263-JAD-CWH**

3 I hereby certify that I electronically filed the foregoing with the Clerk of the  
4 Court for this court by using the CM/ECF system on January 23, 2017.

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

7  
8 /s/ Marc V. Kalagian

9 \_\_\_\_\_  
10 Marc V. Kalagian  
11 Attorneys for Plaintiff  
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