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8 Attorneys for Plaintiff

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14 Attorneys for Defendant

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 18 **UNITED STATES DISTRICT COURT**
 19 **DISTRICT OF NEVADA**

20 MICHAEL SHANE,)
 21)
 Plaintiff,)
 22)
 v.)
 23)
 NANCY A. BERRYHILL,)
 24 Acting Commissioner of Social Security,)
 25)
 Defendant.)

Case No. 2:16-CV-02263-CWH
**JOINT STIPULATION FOR EXTENSION OF
 TIME TO FILE DEFENDANT’S NOTICE OF
 VOLUNTARY REMAND OF THE CASE OR
 CROSS-MOTION TO AFFIRM**
(Second Request)

1 IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that
2 the time for responding to Plaintiff's Motion for Summary Judgment be extended for approximately
3 thirty (30) days from July 21, 2017 to **August 20, 2017**. This is Defendant's second request for
4 extension. Good cause exists to grant Defendant's request for extension. Counsel for Defendant was
5 involved in a car accident on Wednesday, July 19, 2017 and had to take unanticipated medical leave.
6 Counsel for Defendant apologizes for the belated nature of the request, but did not anticipate taking
7 medical leave resulting from her car accident. Additional time is also required as counsel for
8 Defendant has over 50+ active matters, of which two dispositive motions are required until mid-
9 August. Counsel respectfully requests additional time to respond to Plaintiff's Motion for Summary
10 Judgment in order to adequately research, analyze and respond to the issues presented by Plaintiff.
11 Defendant makes this request in good faith with no intention to unduly delay the proceedings.
12 Plaintiff has no objection to the requested relief.
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1 The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

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3 Respectfully submitted,

4 Date: July 21, 2017

5 By: /s/ Cyrus Safa
6 CYRUS SAFA for Marc Kalagian
*by email authorization on 7/21/17
Attorney for Plaintiff

7 Date: July 21, 2017

8 STEVEN W. MYHRE
Acting United States Attorney

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10 By: /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant United States Attorney

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13 **IT IS SO ORDERED.**

14
15
16 DATE: July 24, 2017

17 
18 THE HONORABLE CARL W. HOFFMAN
United States Magistrate Judge

1 **CERTIFICATE OF SERVICE**

2 I, TINA L. NAICKER, certify that the following individual was served with a copy of the
3 **JOINT STIPULATION FOR EXTENSION OF TIME TO FILE DEFENDANT'S NOTICE OF**
4 **VOLUNTARY REMAND OF THE CASE OR CROSS-MOTION TO AFFIRM**

5 on the date and via the method of service identified below:

6 **CM/ECF:**

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23 Attorneys for Plaintiff
24 MICHAEL SHANE

25
26 Respectfully submitted this 21st day of July 2017,

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