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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

MICHAEL SHANE,
Plaintiff,
v.
NANCY A. BERRYHILL,
Acting Commissioner of Social Security,
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**
)

) **(Third 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 two days (2) business days from August 20, 2017 to August 23, 2017. This is Defendant's third
4 request for extension. Good cause exists to grant Defendant's request for extension. Counsel for
5 Defendant has been suffering from chronic migraines, which impairs her vision. Counsel was also
6 recently hospitalized in ER and was on medical leave as a result of her migraines. Currently, Counsel
7 has over 50+ active matters, of which require 2+ dispositive motions a week. As a result of heavy
8 caseload and shortened staff, Counsel became behind on her caseload. Counsel for Defendant
9 apologizes for the belated nature of the request, but did not anticipate taking additional medical leave
10 resulting from her chronic migraines. Counsel respectfully requests additional time to respond to
11 Plaintiff's Motion in order to adequately research, analyze and respond to the issues presented by
12 Plaintiff. Defendant makes this request in good faith with no intention to unduly delay the
13 proceedings. 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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Respectfully submitted,

4 Date: August 21, 2017
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By: /s/ Marc Kalagian
MARC KALAGIAN
*by email authorization on 8/21/17
Attorney for Plaintiff

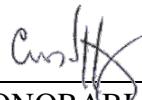
7 Date: August 21, 2017
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STEVEN W. MYHRE
Acting United States Attorney

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

13 **IT IS SO ORDERED.**

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15 DATE: August 24, 2017
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18 THE HONORABLE CARL W. HOFFMAN
19 United States Magistrate Judge
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CERTIFICATE OF SERVICE

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**

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

CM/ECF:

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Attorneys for Plaintiff
MICHAEL SHANE

Respectfully submitted this 21st day of August 2017,

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