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 9 JASON S. CASTLE

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

12	JASON S. CASTLE	)	Case No.: 2:16-cv-02412-GMN-GWF
13	Plaintiff,	)	
14	v.	)	STIPULATION TO EXTEND TIME
15	NANCY A. BERRYHILL, Acting	)	TO FILE MOTION FOR REVERSAL
16	Commissioner of Social Security.	)	AND/OR REMAND
17	Defendant.	)	(FIRST REQUEST)
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19		)	
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24		)	
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18 Plaintiff Jason S. Castle and Defendant Nancy A. Berryhill, Acting  
 19 Commissioner of Social Security, through their undersigned attorneys, stipulate,  
 20 subject to this court’s approval, to extend the time to April 27, 2017 for Plaintiff to  
 21 file Plaintiff’s Motion for Reversal and/or Remand; and that Defendant shall have  
 22 until May 29, 2017, to file her opposition, if any is forthcoming. Any reply by  
 23 plaintiff will be due June 19, 2017.

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1           As the Court is aware, after a 5 year battle with terminal stage 4 cancer  
2 Plaintiff's Counsel's Spouse of the associate, who this matter is assigned to, passed  
3 away on September 30, 2016. The aftermath of this traumatic event on both  
4 Counsel and his 9 year old son and 7 year old daughter was immeasurable.  
5 Compounding the impact of this loss is the fact that Counsel's spouse was a former  
6 employee at Counsel's Law Firm and her death was far reaching in its impact on  
7 Counsel's professional life as well. Due to the death, the subsequent holiday  
8 period, and the need to find a permanent caregiver and the required time to  
9 acclimate his children to that presence during his absence to meet his professional  
10 obligations, Counsel requires the additional time to prepare and file her motion for  
11 summary judgment.

12           Counsel for plaintiff does not anticipate this extraordinary request for more  
13 time to become the rule and recognizes it is the extraordinary exception and  
14 sincerely apologizes to the court for any inconvenience this may have had upon it  
15 or its staff.

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1 DATE: March 8, 2017

Respectfully submitted,  
ROHLFING & KALAGIAN, LLP

*/s/ Marc V. Kalagian*

4 BY: \_\_\_\_\_  
Marc V. Kalagian  
Attorney for plaintiff Mr. Jason S. Castle

7 DATE: March 8, 2017

Daniel G. Bogden  
United States Attorney

*/s/ Hay-Mie Cho*

11 BY: \_\_\_\_\_  
Hay-Mie Cho  
Special Assistant United States Attorney  
Attorneys for defendant Nancy A. Berryhill  
[\*authorized by e-mail]

15 DATED: March 9, 2017

16 IT IS SO ORDERED:

  
\_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE

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