

1 MARC V. KALAGIAN, SBN 4460
 Attorney at Law
 2 211 East Ocean Boulevard, Suite 420
 Long Beach, California 90802
 3 Phone: 562-437-7006
 Fax: 562-432-2935
 4 rohlfig.kalagian@rksslaw.com

5 Attorney for Plaintiff

6 STEVEN W. MYHRE, NSBN 9635
 Acting United States Attorney
 7 BLAINE T. WELSH
 Chief, Civil Division
 8 APRIL A. ALONGI, VSBN 76459
 Special Assistant United States Attorney
 9 160 Spear Street, Suite 800
 10 San Francisco, California 94105
 Phone: 415-977-8954
 11 Fax: 415-744-0134
 april.alongi@ssa.gov

12 Attorneys for Defendant

13 **UNITED STATES DISTRICT COURT**
 14 **DISTRICT OF NEVADA**

16	TANIA V. REAL DE RAGAN,)	Case No: 2:16-cv-02468-JAD-PAL
)	
17	Plaintiff)	
)	
18	v.)	JOINT STIPULATION FOR EXTENSION
)	OF TIME TO FILE DEFENDANT'S
)	CROSS-MOTION TO AFFIRM
19	NANCY A. BERRYHILL, Acting)	
	Commissioner of Social Security, ¹)	(First Request)
20	Defendant.)	
)	
21)	

22
 23
 24 ¹ Nancy A. Berryhill is now the Acting Commissioner of Social Security. Pursuant to Rule 25(d)
 25 of the Federal Rules of Civil Procedure, Nancy A. Berryhill should be substituted for Carolyn W.
 26 Colvin as the defendant in this suit. No further action needs to be taken to continue this case by
 reason of the last sentence of section 205(g) of the Social Security Act. 42 U.S.C. § 405(g).

1 Plaintiff Tania V. Real De Ragan (Plaintiff) and Defendant Nancy A. Berryhill, Acting
2 Commissioner of Social Security (the Commissioner), stipulate, with the approval of this Court,
3 to an extension of time for the Commissioner to file her Cross-Motion To Affirm by thirty-one
4 days from May 5, 2017 to June 5, 2017, with all other dates in this Court's Scheduling Order
5 extended accordingly. This is the Commissioner's first request for an extension.

6 ///

7 ///

8 ///

9 ///

10 ///

11 ///

12 ///

13 ///

14 ///

15 ///

16 ///

17 ///

18 There is good cause because, since Plaintiff filed her Motion For Reversal And/Or Remand
19 (Plaintiff's Motion), counsel has been handling a large number of District Court cases in addition
20 to this one, with two briefs due this week, three briefs due next week, and a settlement conference
21 next week, as well. Additionally, the Commissioner's counsel will be out of the office on approved
22 leave for four days next week. Further, counsel has had numerous other deadlines in the past
23 month, including other District Court briefs, a settlement memorandum, and ongoing discovery in
24 an employment case which was completed this week. As a result, the Commissioner needs
25 additional time to properly respond to the issues Plaintiff raised in her Motion. Plaintiff has no
26

1 objection.

2 Respectfully submitted,

3 Date: May 5, 2017

4 By: /s/* Marc V. Kalagian
5 MARC V. KALAGIAN
6 Attorney at Law
7 *by email authorization on 5/4/17

8 Attorney for Plaintiff

9 Date: May 5, 2017


10 STEVEN W. MYHRE
11 Acting United States Attorney
12 BLAINE T. WELSH
13 Chief, Civil Division

14 By: /s/ April A. Alongi
15 APRIL A. ALONGI
16 Special Assistant United States Attorney

17 Attorneys for Defendant

18 IT IS SO ORDERED.

19
20 DATE: May 5, 2017

21 
22 THE HONORABLE PEGGY A. LEEN
23 United States Magistrate Judge
24
25
26

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

DEFENDANT'S CERTIFICATE OF SERVICE

I certify that I caused the Joint Stipulation For Extension Of Time To File Defendant's Cross-Motion To Affirm (First Request) to be served, via CM/ECF notice, on:

MARC V. KALAGIAN
Attorney at Law
rohlfing.kalagian@rksslaw.com

Date: May 5, 2017

STEVEN W. MYHRE
Acting United States Attorney
BLAINE T. WELSH
Chief, Civil Division

By: /s/ April A. Alongi
APRIL A. ALONGI
Special Assistant United States Attorney

Attorneys for Defendant