

1 **RICHARD A. HARRIS, ESQ.**
2 Nevada State Bar No. 505
3 RICHARD HARRIS LAW FIRM
4 801 S FOURTH ST.
5 LAS VEGAS NV 89101
6 Ph: (702) 444-4392
7 Fax: (702) 444-4455
8 Email: rick@richardharrislaw.com
9 **Attorney for Plaintiff**

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

13 KELLIE T. FORD,

14 Plaintiff,

15 vs.

16 COMMISSIONER OF SOCIAL
17 SECURITY

18 Defendants.

Case No. 2:16-cv-02614-APG-NJK

**STIPULATION FOR EXTENSION
OF TIME TO FILE MOTION TO
REMAND (*SECOND REQUEST*)**

19 Comes now Plaintiff, by and through his attorney, RICHARD HARRIS, ESQ., and
20 requests an eight (8) day extension of time, through and including April 7, 2017 to file the
21 **MOTION TO REMAND**. Plaintiff's current deadline to file the **Motion to Remand** is
22 March 30, 2016. Defendant's counsel has been contacted, has no objection to this request,
23 and stipulates to this Motion via email.

24 This extension is necessary because the firm's contract appellate associate, Linda
25 Ziskin, who will be writing the briefs, has been ill this week.

26 It is therefore respectfully requested that Plaintiff be granted an 8-day extension of
27 time to file the **MOTION TO REMAND** up to and including April 7, 2016.
28

1 DATED this 22nd day of March 2017.

2 /s/ Richard A. Harris

3 **RICHARD A. HARRIS, ESQ.**

4 Nevada State Bar No. 505

5 RICHARD HARRIS LAW FIRM

6 801 S FOURTH ST.

7 LAS VEGAS NV 89101

8 Ph: (702) 444-4392

9 Fax: (702) 444-4455

10 Email: rick@richardharrislaw.com

11 Attorney for Plaintiff

DATED this 22nd day of March 2017.

/s/ Jeffrey Chen

(As authorized via email 3/22/17)

MICHAEL MARRIOTT, ESQ.

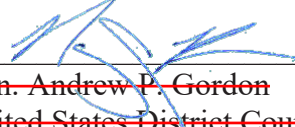
Special Assistant U.S. Attorney

160 Spear Street, Suite 800

San Francisco, CA 94105

(415)977-8939

12 IT IS SO ORDERED.

13 
14 ~~Hon. Andrew P. Gordon~~
15 ~~United States District Court Judge; or~~
16 Hon. Nancy J. Koppe
17 United States Magistrate Judge

18 DATED: March 23, 2017