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 RICHARD E. DONALDSON, ESQ.
 2 Nevada Bar No. 1095
 2300 West Sahara Ave., Suite 800
 3 Las Vegas, NV 89102
 Attorney for Plaintiff
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5 UNITED STATES DISTRICT COURT
 6 DISTRICT OF NEVADA

7 *****

8 LAURA GRIESS)

9 Plaintiff,)

10 vs.)

11 NANCY A. BERRYHILL, ACTING
 12 COMMISSIONER OF SOCIAL
 SOCIAL SECURITY)

13 Defendant.)

Case No. 2:17-cv-00235-RFB-NJK

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 17 **STIPULATION FOR EXTENSION OF TIME TO FILE PLAINTIFF’S OBJECTIONS**
 18 **TO THE MAGISTRATE JUDGE’S REPORT AND RECOMMENDATION**
 19 **(First Request)**

20 IT IS HEREBY STIPULATED, by and between the parties through their respective
 21 counsel, that the Plaintiff, LAURA GRIESS, shall have an additional thirty (30) days, to
 22 and including Thursday, May 1, 2018, in which to file OBJECTIONS TO THE
 23 MAGISTRATE JUDGE’S REPORT AND RECOMMENDATION. This stipulation also
 24 requests that the schedule for a Response by the Defendant, Commissioner of Social
 25 Security, and other corresponding deadlines be adjusted accordingly.

26 The extension of time is necessary because Counsel, a solo practitioner and solely
 27 responsible for the preparation this Objection, has not been able to access the
 28 Recommendation for one week because of technical problems with Pacer and the EM/CEF
 security system Moreover, the administrative record is detailed and involves complex

1 issues. Undersigned Counsel has two forthcoming hearings that are both time and labor
2 intensive. Consequently, there is inadequate time to prepare an Objection in this case
3 within the allotted time. Counsel has spoken with the Commissioner's appellate counsel in
4 this case, and he has no objection to stipulating to this extension.

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6 This is the first request for an extension of time.

7 Respectfully submitted,

8 Date: May 1, 2018

RICHARD E. DONALDSON, ESQ., CHTD.

9 /s/ Richard E. Donaldson

10 Richard E. Donaldson
11 Nevada Bar No. 1095
12 2300 West Sahara Ave., Suite 800
Las Vegas, NV 89102
Attorney for Plaintiff

13 Date: May 1, 2018


DAYLE ELIESON
United States Attorney
14 CHAD A. READLER
15 Acting Assistant Attorney General, Civil Division

16 By: /s/ Ben A. Porter

17 Ben A. Porter, Esq.
Office of the General Counsel
Attorneys for Defendant

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19 IT IS SO ORDERED.

20 Date: May 2, 2018.


21 RICHARD F. BOULWARE, II
United States District Judge