1 2 3 4 5 6 7 8	DANIEL G. BOGDEN, NVBN 2137 United States Attorney DEBORAH LEE STACHEL Regional Chief Counsel, Region IX Social Security Administration MICHAEL K. MARRIOTT, CSBN 280890 Special Assistant United States Attorney 160 Spear Street, Suite 800 San Francisco, California 94105 Telephone: (415) 977-8985 Facsimile: (415) 744-0134 E-Mail: <u>Michael.Marriott@ssa.gov</u> Attorneys for Defendant			
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10	UNITED STATES DISTRICT COURT			
11	DISTRICT OF NEVADA			
12	LAS VEGAS DIVISION			
13				
14	ROBIN P. POGUE,)Case No: 2:17-cv-00251-APG-GWF)			
15	Plaintiff)) STIPULATION FOR EXTENSION OF			
16	v.) TIME TO FILE DEFENDANT'S CROSS) MOTION TO AFFIRM			
17	NANCY A. BERRYHILL, Acting)Commissioner of Social Security,)(First Request)			
18	Defendant.			
19)			
20	Defendant Carolyn W. Colvin, Acting Commissioner of Social Security, hereby requests			
21	an extension of time of thirty days from July 3, 2017 to August 2, 2017, to prepare and file her			
22	cross motion to affirm. This is the Commissioner's first request for an extension.			
23	Defendant respectfully requests this extension of time because of an extremely heavy			
24	workload, and because of upcoming planned leave to help the undersigned's brother move to			
25	Oklahoma City. The Commissioner apologizes for the additional delay in proceedings.			
26	-1-			

1	On June 28, 2017, Plaintiff informed Defendant by email that he had no objection to this				
2	extension.				
3					
4			Respectfully submitted,		
5					
6	Date: June 30, 2017		LAW OFFICES OF LAWRENCE D. ROHLFING		
7		By:	<u>/s/* Cyrus Safa</u> CYRUS SAFA		
8			*authorized by email June 28, 2017		
9			Attorneys for Plaintiff		
10	Date: June 30, 2017		DANIEL G. BOGDEN		
11			United States Attorney		
12		By:	<u>/s/ Michael K. Marriott</u> MICHAEL K. MARRIOTT		
13			Assistant Regional Counsel		
14			Attorneys for Defendant		
15	Of Coursel				
16	Of Counsel Jeffrey Chen				
17	Assistant Regional Counsel Social Security Administration				
18					
19					
20			IT IS SO ORDERED.		
21			U CO		
22	DATE: _July 5, 2017		George Holey fr.		
23			HONORABLE GEORGE FOLEY, JR. United States Magistrate Judge		
24					
25					
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1	CERTIFICATE OF SERVICE					
2						
3	I, Michael K. Marriott, hereby certify that I caused a copy of Stipulation for Extension of Time					
4	to File Defendant's Cross Motion to Affirm to be served, via CM/ECF notification, on:					
5	Cyrus Safa Law Offices of Lawrence D. Rohlfing					
6	12631 E. Imperial Highway, Suite C-115 Santa Fe Springs, CA 90670					
7	Leonard H Stone					
8 9	Shook & Stone Chtd. 710 S. Fourth St.					
10	Las Vegas, NV 89101					
11	Date: June 30, 2017 DANIEL G. BOGDEN					
12	United States Attorney					
13	By: <u>/s/ Michael K. Marriott</u> MICHAEL K. MARRIOTT					
14	Assistant Regional Counsel					
15	Attorneys for Defendant					
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