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Attorneys for Plaintiff

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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TINISHA PRICE

Plaintiff.

V.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security

Defendant.

) **JOINT STIPULATION FOR EXTENSION OF
TIME TO FILE DEFENDANT'S NOTICE OF
VOLUNTARY REMAND OF THE CASE OR
CROSS-MOTION TO AFFIRM**
)
) **(Second Request)**

1 IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that
2 the time for responding to Plaintiff's Motion for Summary Judgment be extended for approximately
3 two weeks from August 31, 2017 to September 15, 2017. This is Defendant's second request for
4 extension. Good cause exists to grant Defendant's request for extension. Additional time is required
5 as Counsel for Defendant (Counsel) has over 50+ active matters, of which two dispositive motions per
6 week until the early October. Counsel has been on intermittent medical leave due to her chronic
7 migraines and daily recurrent headaches. As a result of unanticipated medical leave, Counsel became
8 behind on her caseload. As such, Counsel respectfully requests additional time in order to address the
9 issues raised in Plaintiff's Motion. Defendant makes this request in good faith with no intention to
10 unduly delay the proceedings. Plaintiff has no objection to the requested relief.

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1 The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.
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Respectfully submitted,

4 Date: August 29, 2017
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By: /s/ Cyrus Safa
CYRUS SAFA
*by email authorization on 8/29/17
Attorney for Plaintiff

7 Date: August 29, 2017
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STEVEN W. MYHRE
Acting United States Attorney

10 By:/s/ Tina L. Naicker
11 TINA L. NAICKER
12 Special Assistant United States Attorney
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IT IS SO ORDERED.

15 DATE: August 29, 2017
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18 THE HONORABLE CAM FERENBACH
19 United States Magistrate Judge
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CERTIFICATE OF SERVICE

I, TINA L. NAICKER, certify that the following individual was served with a copy of the

**3 JOINT STIPULATION FOR EXTENSION OF TIME TO FILE DEFENDANT'S NOTICE OF
4 VOLUNTARY REMAND OF THE CASE OR CROSS-MOTION TO AFFIRM**

on the date and via the method of service identified below:

CM/ECF:

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Respectfully submitted this 29th day of August 2017,

/s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant United States Attorney