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9 Attorneys for Plaintiff

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 11 District of Nevada
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15 Attorneys for Defendant

16
 17 **UNITED STATES DISTRICT COURT**
 18 **DISTRICT OF NEVADA**

19 TINISHA PRICE)
 20)
 Plaintiff,)
 21)
 v.)
 22)
 NANCY A. BERRYHILL,)
 23 Acting Commissioner of Social Security,)
 24 Defendant.)

Case No. 2:17-cv-00755-JCM-VCF

**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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3 Respectfully submitted,

4 Date: August 29, 2017

5 By: /s/ Cyrus Safa
6 CYRUS SAFA
*by email authorization on 8/29/17
Attorney for Plaintiff

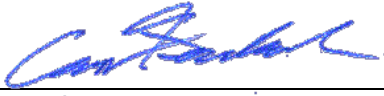
7 Date: August 29, 2017

8 STEVEN W. MYHRE
Acting United States Attorney

9
10 By: /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant United States Attorney

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12 **IT IS SO ORDERED.**

13
14
15 DATE: August 29, 2017

16 
17 THE HONORABLE CAM FERENBACH
United States Magistrate Judge

1 **CERTIFICATE OF SERVICE**

2 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**

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

6 **CM/ECF:**

7
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23
24 Respectfully submitted this 29th day of August 2017,

25
26 /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant United States Attorney