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15 Attorneys for Plaintiff

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25 Attorneys for Defendant

26

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**  
)

) **(Third 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 one week from  
3 September 15, 2017 to September 22, 2017. This is Defendant's third request for extension. Good  
4 cause exists to grant Defendant's request for extension. Counsel continues to have debilitating  
5 migraines and daily headaches and is on intermittent medical leave. As a result of unanticipated  
6 medical leave, Counsel respectfully requests additional time in order to address the issues raised in  
7 Plaintiff's Motion. Defendant makes this request in good faith with no intention to unduly delay the  
8 proceedings. Plaintiff has no objection to the requested relief. The parties further stipulate that the  
9 Court's Scheduling Order shall be modified accordingly.

10  
11 Respectfully submitted,

12 Date: September 14, 2017

13 By: /s/ Cyrus Safa  
14 CYRUS SAFA  
15 \*by email authorization on 9/14/17  
16 Attorney for Plaintiff

17 Date: September 14, 2017

18 STEVEN W. MYHRE  
19 Acting United States Attorney

20  
21 By:/s/ Tina L. Naicker  
22 TINA L. NAICKER  
23 Special Assistant United States Attorney

24 IT IS SO ORDERED.

25 DATE: 9-15-2017



26 THE HONORABLE CAM FERENBACH  
United States Magistrate Judge

## **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 14th day of September 2017,

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