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Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA – LAS VEGAS DIVISION**

JERRI L. RAEI,
Plaintiff,
vs.
NANCY A. BERRYHILL,
Acting Commissioner of Social Security,
Defendant.
CIVIL NO. 2:17-cv-00947-GMN-VCF
**DEFENDANT'S UNOPPOSED
MOTION FOR EXTENSION OF
TIME (FIRST REQUEST)**

IT IS HEREBY STIPULATED, by and between Jerri L. Rael (Plaintiff) and Nancy A. Berryhill, Acting Commissioner of Social Security (Defendant), by and through their respective counsel of record, that Defendant shall have an extension of time of forty-five (45) days to deliver her Motion for Summary Judgment and in Opposition to Plaintiff's Motion for Summary Judgment. The current due date is November 20, 2017. The new due date will be January 4, 2018. The parties further stipulate that all other dates will be extended accordingly, and Plaintiff's reply will be due to Defendant by January 24, 2018.

This is the first extension of time requested by Defendant in the above-captioned matter. Defendant requests this extension because the attorney responsible for briefing this case was only recently assigned this case, has an unusually heavy workload this month, and is taking some leave time during the upcoming holidays. This request is made in good faith with no intention to unduly delay the

1 proceedings. Counsel for Defendant conferred with Plaintiff's counsel, Mark Barrett, who has no
2 opposition to this motion, on November 16, 2017. It is therefore respectfully requested that Defendant
3 be granted a forty-five (45) day extension of time to respond to Plaintiff's motion, up to and including
4 January 4, 2018.
5

6 Respectfully submitted,

7 Dated: November 16, 2017

By: /s/ Mark D. Barrett *
8 MARK D. BARRETT
9 (*by email authorization on 11/16/17)

10 Dated: November 16, 2017

11 STEVEN W. MYHRE
12 Acting United States Attorney

13 By: /s/ Gina Tomaselli
14 GINA TOMASELLI
15 Special Assistant United States Attorney

16 Attorneys for Defendant

17 IT IS SO ORDERED:
18 
19

20 THE HONORABLE CAM FERENBACH
21 UNITED STATES MAGISTRATE JUDGE

22 DATE: 11-20-2017

1 IT IS HEREBY CERTIFIED THAT:

2
3 I, Gina Tomaselli, certify that the following individual(s) were served with a copy of the
4 foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date and via the method
5 of service identified below:

6 **CM/ECF:**

7 Mark D. Barrett
8 Osterhout Berger Disability Law, LLC
521 Cedar Way, Ste. 200
9 Oakmont, PA 15139
412-794-8003
10 Fax: 412-794-8050
11 Email: Mark@mydisabilityattorney.com

12 Hal Taylor
13 223 Marsh Avenue
Reno, NV 89509
14 Email: haltaylorlawyer@gbis.com

15 I declare under penalty of perjury that the foregoing is true and correct.

16 Dated: November 16, 2017

STEVEN W. MYHRE
Acting United States Attorney

18 By: */s/ Gina Tomaselli*
19 GINA TOMASELLI
20 Special Assistant United States Attorney

21 Attorneys for Defendant