

1 STEVEN W. MYHRE (NSBN 9635)
 Acting United States Attorney
 District of Nevada
 2 TINA NAICKER, CSBN 252766
 Special Assistant United States Attorney
 3 160 Spear Street, Suite 800
 4 San Francisco, California 94105
 Telephone: (415) 268-5611
 5 Facsimile: (415) 744-0134
 E-Mail: Tina.Naicker@SSA.gov

6 Attorneys for Defendant

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 10 **UNITED STATES DISTRICT COURT**
 11 **DISTRICT OF NEVADA**

12 KELLY J. ANDERSON,)
)
 13 Plaintiff,)
)
 14 v.)
)
 15 NANCY A. BERRYHILL,)
 Acting Commissioner of Social Security,)
 16 Defendant.)

Case No. 2:17-CV-01177-RFB-GWF

**JOINT STIPULATION AND ~~PROPOSED~~
 ORDER FOR EXTENSION OF TIME TO
 RESPOND TO PLAINTIFF'S MOTION FOR
 REVERSAL AND/OR REMAND**

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 19 IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that
 20 the time for responding to Plaintiff's Motion for Reversal and/or Remand be extended for thirty days
 21 from November 20, 2017 to **December 20, 2017**. This is Defendant's first request for extension.
 22 Good cause exists to grant Defendant's request for extension. Counsel for Defendant was on
 23 unexpected medical leave and became behind on her caseload. Additional time is required as Counsel
 24 for Defendant has over 75 active pending matters, of which require 2+ responses to dispositive
 25 motions per week until early-January. Due to current workload demands and shortened staff, Counsel
 26

1 needs additional time to adequately review the transcript and properly respond to Plaintiff's Motion
2 for Summary Judgment. Defendant makes this request in good faith with no intention to unduly delay
3 the proceedings. The parties further stipulate that the Court's Scheduling Order shall be modified
4 accordingly.
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6

7 Respectfully submitted,

9 Dated: November 20, 2017

/s/ *Daniel Jones
(*as authorized by email on November 20, 2017)
DANIEL JONES
Attorney for Plaintiff

13 Dated: November 20, 2017

STEVEN W. MYHRE
Acting United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

17 By /s/ Tina L. Naicker
18 TINA L. NAICKER
19 Special Assistant U.S. Attorney
Attorneys for Defendant

20 **ORDER**

21 APPROVED AND SO ORDERED:

24 DATED: 11/21/2017


HON. GEORGE FOLEY, JR.
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 AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO**
4 **RESPOND TO PLAINTIFF’S MOTION FOR REVERSAL AND/OR REMAND** on the date and
5 via the method of service identified below:

6 **CM/ECF:**

7 **Daniel S. Jones**

8 Law Offices of Charles E. Binder and Harry J. Binder, LLP
9 60 East 42 Street
10 Ste 520
11 New York, NY 10165
12 212-667-6801
13 Email: fedcourt@binderlawfirm.com

14 **Hal Taylor**

15 223 Marsh Avenue
16 Reno, NV 89509
17 775-825-2223
18 Fax: 775-329-1113
19 Email: haltaylorlawyer@gbis.com

20 Attorneys for Plaintiff

21 Respectfully submitted this 20th day of November 2017,

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