

1 STEVEN W. MYHRE (NSBN 9635)
2 Acting United States Attorney
3 District of Nevada
4 TINA NAICKER, CSBN 252766
5 Special Assistant United States Attorney
6 160 Spear Street, Suite 800
7 San Francisco, California 94105
8 Telephone: (415) 268-5611
9 Facsimile: (415) 744-0134
10 E-Mail: Tina.Naicker@SSA.gov

11 Attorneys for Defendant

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 KELLY J. ANDERSON,)
15 Plaintiff,) Case No. 2:17-CV-01177-RFB-GWF
16 v.)
17 NANCY A. BERRYHILL,) **JOINT STIPULATION AND [PROPOSED]**
18 Acting Commissioner of Social Security,) **ORDER FOR EXTENSION OF TIME TO**
19 Defendant.) **RESPOND TO PLAINTIFF'S MOTION FOR**
20 **REVERSAL AND/OR REMAND**

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

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.

5
6
7 Respectfully submitted,

8
9 Dated: November 20, 2017

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

14 Dated: November 20, 2017

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

20 By

21 /s/ Tina L. Naicker
22 TINA L. NAICKER
23 Special Assistant U.S. Attorney
24 Attorneys for Defendant

25 **ORDER**

26 APPROVED AND SO ORDERED:

DATED: 11/21/2017


25 HON. GEORGE FOLEY, JR.
26 UNITED STATES MAGISTRATE JUDGE

CERTIFICATE OF SERVICE

I, TINA L. NAICKER, certify that the following individual was served with a copy of the
JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF'S MOTION FOR REVERSAL AND/OR REMAND on the date and
via the method of service identified below:

CM/ECF:

Daniel S. Jones
Law Offices of Charles E. Binder and Harry J. Binder, LLP
60 East 42 Street
Ste 520
New York, NY 10165
212-667-6801
Email: fedcourt@binderlawfirm.com

Hal Taylor
223 Marsh Avenue
Reno, NV 89509
775-825-2223
Fax: 775-329-1113
Email: haltaylorlawyer@gbis.com

Attorneys for Plaintiff

Respectfully submitted this 20th day of November 2017,

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