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 2 District of Nevada  
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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 December 20, 2017 to **January 17, 2018**. This is Defendant's second request for extension.  
 22 Good cause exists to grant Defendant's request for extension. Counsel was unexpectedly out sick with  
 23 the flu and became behind on her caseload. Additional time is required as Counsel has over 75 active  
 24 pending matters, of which require 2+ responses to dispositive motions per week until mid-January. In  
 25 addition, Counsel has three pending Ninth Circuit matters, which require additional levels or review.  
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1 Counsel is also expected to take some time off for the upcoming holidays. Due to current workload  
2 demands and shortened staff, Counsel needs additional time to adequately review the transcript and  
3 properly respond to Plaintiff's Motion for Summary Judgment. Defendant makes this request in good  
4 faith with no intention to unduly delay the proceedings. The parties further stipulate that the Court's  
5 Scheduling Order shall be modified accordingly.  
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7 Respectfully submitted,

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9 Dated: December 14, 2017

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

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13 Dated: December 14, 2017

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

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

21 **ORDER**

22 APPROVED AND SO ORDERED:

23  
24 DATED: 12/15/2017

  
HON. GEORGE FOLEY, JR.  
UNITED STATES MAGISTRATE JUDGE