



1 Counsel apologizes for the belated nature of the request, but did not expect to take unanticipated leave  
2 due to the unexpected family death. As such, Counsel respectfully requests additional time to  
3 adequately review the transcript and properly respond to Plaintiff's Motion for Summary Judgment.  
4 Defendant makes this request in good faith with no intention to unduly delay the proceedings. The  
5 parties further stipulate that the Court's Scheduling Order shall be modified accordingly.  
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7 Respectfully submitted,

8  
9 Dated: January 22, 2018

/s/ \*Daniel Jones  
(\*as authorized by email on January 22, 2018)  
DANIEL JONES  
Attorney for Plaintiff

10  
11  
12  
13 Dated: January 22, 2018

DAYLE ELIESON  
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  
TINA L. NAICKER  
Special Assistant U.S. Attorney  
Attorneys for Defendant

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20 **ORDER**

21 APPROVED AND SO ORDERED:

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23  
24 DATED: 1/23/2018

  
HON. GEORGE FOLEY, JR.  
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](mailto:fedcourt@binderlawfirm.com)

**Hal Taylor**

223 Marsh Avenue  
Reno, NV 89509  
775-825-2223  
Fax: 775-329-1113  
Email: [haltaylorlawyer@gbis.com](mailto:haltaylorlawyer@gbis.com)

Attorneys for Plaintiff

Respectfully submitted this 22<sup>nd</sup> day of January 2018,

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