

1 STEVEN W. MYHRE, CSBN 9635
 Acting United States Attorney
 2 BLAINE T. WELSH
 Chief, Civil Division
 3 GINA TOMASELLI, CSBN 267090
 Special Assistant United States Attorney
 4 160 Spear Street, Suite 800
 5 San Francisco, California 94105
 Telephone: (415) 268-5602
 6 Facsimile: (415) 744-0134
 7 E-Mail: Gina.Tomaselli@ssa.gov

8 Attorneys for Defendant

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

11 MIA ANNE MCDONALD,
 12 Plaintiff,
 13 vs.
 14 NANCY A. BERRYHILL,
 15 Acting Commissioner of Social Security,
 16 Defendant.

) CIVIL NO. 2:17-cv-01445-RFB-NJK
)
) **DEFENDANT’S UNOPPOSED**
) **MOTION FOR EXTENSION OF**
) **TIME**

17
 18 IT IS HEREBY STIPULATED, by and between Mia Anne McDonald (Plaintiff) and Nancy A.
 19 Berryhill, Acting Commissioner of Social Security (Defendant), by and through their respective counsel
 20 of record, that Defendant shall have an extension of time of thirty-five (35) days to deliver her Motion
 21 for Summary Judgment and in Opposition to Plaintiff’s Motion for Summary Judgment. The current due
 22 date is November 15, 2017. The new due date will be December 20, 2017. The parties further stipulate
 23 that all other dates will be extended accordingly, and Plaintiff’s reply will be due to Defendant by
 24 January 9, 2018.

25 This is the second extension of time requested by Defendant in the above-captioned matter.
 26 Defendant requests this extension because this case was recently transferred to another attorney with a
 27 heavy workload and has not had sufficient time to fully consider the issues in this case. This request is
 28 made in good faith with no intention to unduly delay the proceedings. Counsel for Defendant conferred

1 with Plaintiff's counsel, who has no opposition to this motion, on March 20, 2017. It is therefore
2 respectfully requested that Defendant be granted a thirty-five (35) day extension of time to respond to
3 Plaintiff's motion, up to and including December 20, 2017.
4

5 Respectfully submitted,

6 Dated: November 13, 2017

7 By: /s/ Joshua R. Harris *
8 JOSHUA R. HARRIS
9 Richard Harris Law Firm
10 (*by email authorization on 11/13/17)

11 Dated: November 13, 2017

12 STEVEN W. MYHRE
13 Acting United States Attorney
14 BLAINE T. WELSH
15 Chief, Civil Division

16 By: /s/ Gina Tomaselli
17 GINA TOMASELLI
18 Special Assistant United States Attorney

19 Attorneys for Defendant

20 IT IS SO ORDERED:

21 
22 _____
23 THE HONORABLE NANCY J. KOPPE
24 UNITED STATES MAGISTRATE JUDGE

25 DATE: November 14, 2017
26 _____
27
28