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10 Attorneys for Plaintiff  
 NAIM R. COSTANDI

11  
 12 **UNITED STATES DISTRICT COURT**  
 13 **DISTRICT OF NEVADA**  
 14

15 NAIM R. COSTANDI	)	Case No.: 2:17-cv-02019-JCM-PA
	)	
16 Plaintiff,	)	UNOPPOSED MOTION TO EXTEND
v.	)	TIME TO FILE MOTION FOR
	)	REVERSAL AND/OR REMAND
17 NANCY A. BERRYHILL,	)	
18 Acting Commissioner of Social	)	(FIRST REQUEST)
Security,	)	
	)	
19	)	
20 Defendant.	)	

21 Plaintiff Naim R. Costandi respectfully requests that the Court extend the  
 22 time for Plaintiff to file her Motion for Reversal and/or Remand by 35 days from  
 23 June 7, 2018 to July 12, 2018, with all other dates in the Court’s Order Concerning  
 24 Review Of Social Security Cases extended accordingly. Of Counsel for Plaintiff  
 25 has conferred with Defendant’s counsel, who has no opposition to this motion, on  
 26 June 11, 2018.

1 This is Plaintiff's first request for an extension. As the Court may be aware  
2 of Plaintiff's Of Counsel situation with other Social Security cases, Counsel's  
3 mother has been fighting a losing battle with Systemic Lupus Erythematosus that  
4 has required multiple surgeries these past two years due inflammation affecting the  
5 kidneys and lungs. On February 6, 2018, Of Counsel's mother was taken to the  
6 emergency room and was admitted to the hospital. On February 8, 2018, Of  
7 Counsel's mother had a surgery to avoid further kidney obstruction due to the  
8 Lupus inflammation and kidney infection.

9 On February 16, 2018, Of Counsel's husband's mother suffered two  
10 ischemic strokes, requiring 24-hour daily care for her activities of daily living up to  
11 present day, which Of Counsel has had to assist with. On March 28, 2018, Of  
12 Counsel's mother was advised that another kidney surgery was medically  
13 necessary. On May 8, 2018, Of Counsel's mother had the first of three procedures  
14 to her kidney. On May 25, 2018, Of Counsel's mother was informed that the  
15 kidney infection is not curable, and the first of three kidney surgeries will take  
16 place July 17, 2018.

17 On June 7, 2018 at 3:30 a.m., Of Counsel's husband suffered a micturition  
18 syncope resulting in a concussion, 17 staples to his head, and a blood transfusion.  
19 Of Counsel was in the hospital with her husband on June 7, 2018 and required her  
20 attention for 24-hour watch due to the concussion.

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1 This is not an ordinary circumstance for Of Counsel and Of Counsel  
2 sincerely apologizes to the Court for any inconvenience this may have cause.

3 DATE: June 11, 2018

Respectfully submitted,

4 LAWRENCE D. ROHLFING

5 /s/ *Cyrus Safa*

6 BY: \_\_\_\_\_


Cyrus Safa

Attorney for plaintiff Mr. Naim R. Costandi

7 Of Counsel:  
8 Monica Perales  
9 Attorney at Law

10  
11 DATED: June 13, 2018

12 IT IS SO ORDERED:



13 UNITED STATES MAGISTRATE JUDGE

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