

1 **RICHARD A. HARRIS, ESQ.**

Nevada State Bar No. 505

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**Attorney for Plaintiff**

8  
9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 TEA CISNEROS-DYSTHE,

12 Plaintiff,

13 vs.

14 COMMISSIONER OF SOCIAL  
15 SECURITY,

16 Defendant.

Case No. 2:17-cv-02143-RFB-GWF

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19 **PLAINTIFF'S UNOPPOSED**  
20 **MOTION FOR EXTENSION OF**  
21 **TIME TO FILE MOTION FOR**  
22 **REMAND AND/OR REVERSAL**  
23 **(FIRST REQUEST)**

24  
25 IT IS HEREBY STIPULATED, by and between TEA CISNEROS-DYSTHE (Plaintiff)  
26 and NANCY A. BERRYHILL, Acting Commissioner of Social Security (Defendant), by and  
27 through their respective counsel of record, that Plaintiff shall have an extension of time to  
28 deliver the **MOTION FOR REMAND AND/OR REVERSAL**.

The current due date is December 27, 2017. The new due date will be January 26, 2018.  
The parties further stipulate that all other dates will be extended accordingly, and Defendant's  
response will be due to Plaintiff by February 25, 2018.

This is the first extension of time requested by Plaintiff in the above-captioned matter.  
Plaintiff requests this extension because the Appellate Attorney Writer is ill to the extent her  
vision is affected and she therefore cannot effectively write. This request is made in good faith  
with no intention to unduly delay the proceedings. Counsel for Plaintiff has conferred with  
Defendant's counsel, who had no opposition to this motion on December 26, 2017.

1 It is therefore respectfully requested that Plaintiff be granted a thirty (30) day  
2 extension of time to file the **MOTION FOR REMAND AND/OR REVERSAL** up to  
3 and including January 26, 2018.

4 DATED this 26th day of December 2017.

DATED this 26th day of December 2017.

5  
6 /s/ Richard A. Harris

**RICHARD A. HARRIS, ESQ.**

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Attorney for Plaintiff

7  
8 /s/ Richard M. Rodriguez

(As authorized via email 12/26/17 10:02am)

MARK E WOOLF

United States Attorney

**RICHARD M. RODRIGUEZ**

Special Assistant United States Attorney

Attorneys for Defendant

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15 IT IS SO ORDERED.



16  
17 THE HONORABLE GEORGE FOLEY, JR.  
18 UNITED STATES MAGISTRATE JUDGE

19  
20 DATE: December 27, 2017

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