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 2 District of Nevada  
 TINA NAICKER, CSBN 252766  
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6 Attorneys for Defendant

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

12 SHERMAINE CARROLL, )  
 )  
 13 Plaintiff, )  
 )  
 14 v. )  
 )  
 15 NANCY A. BERRYHILL, )  
 Acting Commissioner of Social Security, )  
 16 Defendant. )

Case No. 2:17-cv-02237-MMD-PAL

**JOINT STIPULATION AND [PROPOSED]  
 ORDER FOR EXTENSION OF TIME TO  
 RESPOND TO PLAINTIFF’S MOTION FOR  
 REVERSAL 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 one week  
 21 from March 2, 2018 to **March 9, 2018**. This is Defendant’s third request for extension. Good cause  
 22 exists to grant Defendant’s request for extension. Counsel for Defendant has a debilitating migraine  
 23 that impairs her vision on the date of the current filing deadline. In addition, Counsel has over 75+  
 24 active pending matters, of which require 2+ dispositive motions until mid April. Counsel also has  
 25 three pending Ninth Circuit matters which require additional levels of review due in early March. Due  
 26

1 to unanticipated leave and high workload demands, Counsel needs additional time to properly respond  
2 to Plaintiff's Motion for Summary Judgment. Counsel apologizes for the belated request but did not  
3 anticipate being out on leave due to her debilitating migraine. 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.  
6

7 Respectfully submitted,

8  
9 Dated: March 2, 2018

/s/ \*Cyrus Safa  
(\*as authorized by email on March 2, 2018)  
CYRUS SAFA  
Attorney for Plaintiff

10  
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12  
13 Dated: March 2, 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  
18 TINA L. NAICKER  
19 Special Assistant U.S. Attorney  
Attorneys for Defendant

20 **ORDER**

21 APPROVED AND SO ORDERED:

22  
23  
24 DATED: March 7, 2018

  
THE HONORABLE PEGGY A. LEEN  
UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 I, TINA L. NAICKER, certify that the following individual was served with a copy of the  
3 **JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO**  
4 **RESPOND TO PLAINTIFF'S MOTION FOR REVERSAL OR REMAND** on the date and via  
5 the method of service identified below:

6 **CM/ECF:**

7  
8 Cyrus Safa  
9 Law Offices of Lawrence D. Rohlfling  
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23 Attorneys for Plaintiff

24  
25 Respectfully submitted this 2<sup>nd</sup> day of March 2018,  
26

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