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 2 District of Nevada  
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6 Attorneys for Defendant

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 9  
 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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 18  
 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 two business  
 21 days from March 9, 2018 to **March 13, 2018**. This is Defendant’s fourth request for extension. Good  
 22 cause exists to grant Defendant’s request for extension. Counsel for Defendant is out sick on the date  
 23 of the current filing deadline. Counsel apologizes for the belated request but did not anticipate being  
 24 out on sick leave. Defendant makes this request in good faith with no intention to unduly delay the  
 25  
 26

1 proceedings. The parties further stipulate that the Court's Scheduling Order shall be modified  
2 accordingly.

3 Respectfully submitted,

4  
5 Dated: March 9, 2018

6 /s/ \*Cyrus Safa  
7 (\*as authorized by email on March 9, 2018)  
8 CYRUS SAFA  
9 Attorney for Plaintiff

10 Dated: March 9, 2018

11 DAYLE ELIESON  
12 Acting United States Attorney  
13 DEBORAH LEE STACHEL  
14 Regional Chief Counsel, Region IX  
15 Social Security Administration

16 By /s/ Tina L. Naicker  
17 TINA L. NAICKER  
18 Special Assistant U.S. Attorney  
19 Attorneys for Defendant

20 **ORDER**

21 APPROVED AND SO ORDERED:

22 DATED: March 13, 2018

23   
24 THE HONORABLE PEGGY A. LEEN  
25 UNITED STATES MAGISTRATE JUDGE  
26

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. Rohlfiing  
10 12631 E. Imperial Highway, Suite C-115  
11 Santa Fe Springs, CA 90670  
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15  
16 Gerald Welt  
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20 702-382-2030  
21 Fax: 702-684-5157  
22 Email: gmwesq@weltlaw.com

23 Attorneys for Plaintiff

24  
25 Respectfully submitted this 9th day of March 2018,  
26

27 */s/ Tina L. Naicker*  
28 TINA L. NAICKER  
29 Special Assistant United States Attorney