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 2 District of Nevada
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6 Attorneys for Defendant

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

12 DONNA L. GRAY)

13 Plaintiff,)

14 v.)

15 NANCY A. BERRYHILL,
 Acting Commissioner of Social Security,)

16 Defendant.)

Case No. 2:17-cv-02307-JAD-NJK

JOINT STIPULATION AND ~~(PROPOSED)~~
ORDER FOR EXTENSION OF TIME TO
RESPOND TO PLAINTIFF’S MOTION FOR
REVERSAL OR REMAND

(SECOND REQUEST)

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 18 IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that
 19 the time for responding to Plaintiff’s Motion for Summary Judgment be extended from March 26,
 20 2018 to **April 26, 2018**. This is Defendant’s second request for extension. Good cause exists to grant
 21 Defendant’s request for extension. Counsel has four pending Ninth Circuit matters, which require
 22 multiple levels of review. In addition, Counsel has over 75+ pending social security cases, which
 23 require two or more dispositive motions a week until late May. Counsel also has four pending civil
 24 rights matters which require imminent attention and investigation. Counsel also became behind on her
 25 heavy caseload due to medical issues. Due to current workload demands and unanticipated leave,
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1 Counsel needs additional time to adequately review the transcript and properly respond to Plaintiff's
2 Motion for Summary Judgment. Counsel apologizes for the belated request, but did not anticipate
3 seeking additional time due to her ongoing medical issues and unanticipated leave. Defendant makes
4 this request in good faith with no intention to unduly delay the proceedings. The parties further
5 stipulate that the Court's Scheduling Order shall be modified accordingly.
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7 Respectfully submitted,

8 Dated: March 26, 2018

/s/ *Cyrus Safa
(*as authorized by email on March 26, 2018)
CYRUS SAFA
Attorney for Plaintiff

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12 Dated: March 26, 2018

DAYLE ELIESON
United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

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

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19 **ORDER**

20 APPROVED AND SO ORDERED:

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23 DATED: March 27, 2018



HON. NANCY J. KOPPE
UNITED STATES MAGISTRATE JUDGE