

1 DAYLE ELIESON
 United States Attorney
 District of Nevada
 2 TINA NAICKER, CSBN 252766
 Special Assistant United States Attorney
 3 160 Spear Street, Suite 800
 San Francisco, California 94105
 Telephone: (415) 268-5611
 4 Facsimile: (415) 744-0134
 5 E-Mail: Tina.Naicker@SSA.gov

6 Attorneys for Defendant

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

12 LESLIE R. LEONARDO
 Plaintiff,

13 v.

14 NANCY A. BERRYHILL,
 Acting Commissioner of Social Security,

15 Defendant.
 16

) Case No. 2:18-cv-00279-CWH

) **JOINT STIPULATION AND [PROPOSED]**
) **ORDER FOR EXTENSION OF TIME FOR**
) **DEFENDANT TO RESPOND TO PLAINTIFF'S**
) **MOTION FOR**

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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 August 15,
 20 2018 to **August 29, 2018**. This is Defendant's second request for extension. Good cause exists to
 21 grant Defendant's request for extension. Counsel had another death in her family as well as a family
 22 medical emergency of an immediate family member. Counsel also has over 85+ pending social
 23 security cases, which require two or more dispositive motions a week until mid-September, a pending
 24 Ninth Circuit matter, and several non-litigation civil rights and representative misconduct matters that
 25 require prompt attention and investigation. 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 Remand. Defendant makes this request in good faith with no intention to unduly delay the
3 proceedings. The parties further stipulate that the Court's Scheduling Order shall be modified
4 accordingly.
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7 Respectfully submitted,

8 Dated: August 15, 2018

/s/ *Edward A. Wicklund
(*as authorized by email on August 15, 2018)
EDWARD A. WICKLUND
Attorney for Plaintiff

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12 Dated: August 15, 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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22 DATED: August 17, 2018


HON. CARL W. HOFFMAN
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 FOR**
4 **DEFENDANT TO RESPOND TO PLAINTIFF'S MOTION FOR REMAND** on the date and via
5 the method of service identified below:

6 **CM/ECF:**

7 Edward A. Wicklund
8 Olinsky Law Group
9 300 S. State St., Ste. 420
10 Syracuse, NY 13202
11 315-701-5780
12 Fax: 315-701-5781
13 Email: twicklund@windisability.com

14 Hal Taylor
15 223 Marsh Avenue
16 Reno, NV 89509
17 775-825-2223
18 Fax: 775-329-1113
19 Email: haltaylorlawyer@gbis.com

20 Attorneys for Plaintiff

21 Respectfully submitted this 15th day of August 2018,

22 */s/ Tina L. Naicker*
23 TINA L. NAICKER
24 Special Assistant United States Attorney
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