

Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ROSA G. VANDIVER,

Plaintiff,

V.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,

Defendant.

Case No.: 2:18-cv-00362-JAD-CWH

DEFENDANT'S UNOPPOSED MOTION FOR EXTENSION OF TIME

IT IS HEREBY STIPULATED, by and between Rosa G. Vandiver (Plaintiff) and Nancy A. Berryhill, Acting Commissioner of Social Security (Defendant), by and through their respective counsel of record, that Defendant shall have an extension of time of forty-five (45) days to file her Opposition to Plaintiff's Motion for Summary Judgment. The current due date is July 16, 2018. The new date will be August 30, 2018. An extension of time is needed because the attorney responsible for briefing this case is still recovering from a medical procedure, requiring her to take medical leave, and is now facing a backlog of cases already on extension. This is the first extension of time requested by Defendant in the above. This request is made in good faith with no intention to unduly delay the proceedings. The parties further stipulate that the Court's Scheduling Order shall be modified accordingly.

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2 Dated: July 12, 2018

By: /s/ Marc V. Kalagian*
MARC V. KALAGIAN
Rohlfing & Kalagian, LLP
Attorney for Plaintiff
(*As authorized via email on 7/12/18)

6 Dated: July 12, 2018

DAYLE ELIESON
United States Attorney

/s/ Gina Tomaselli
GINA TOMASELLI
Special Assistant United States Attorney

12 IT IS SO ORDERED:

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14 THE HONORABLE CARL W. HOFFMAN
15 UNITED STATES MAGISTRATE JUDGE

16 DATE: July 16, 2018
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1 IT IS HEREBY CERTIFIED THAT:

2 I, Gina Tomaselli, certify that the following individual(s) were served with a copy of the
3 foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date and via the method
4 of service identified below:

5 **CM/ECF:**

6 Marc V Kalagian
7 Rohlfing & Kalagian, LLP
8 211 E. Ocean Blvd.
9 Suite 420
Long Beach, CA 90802
Email: marc.kalagian@rksslaw.com

10
11 I declare under penalty of perjury that the foregoing is true and correct.

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13
14 Dated: July 12, 2018

DAYLE ELIESON
United States Attorney
District of Nevada

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16 By: /s/ Gina Tomaselli
17 GINA TOMASELLI
Special Assistant United States Attorney

18 Attorneys for Defendant
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