

1 DAYLE ELIESON
 2 United States Attorney
 3 District of Nevada
 4 DEBORAH LEE STACHEL, CSBN 230138
 5 Regional Chief Counsel, Region IX
 6 GINA TOMASELLI
 7 Special Assistant United States Attorney
 8 160 Spear Street, Suite 800
 9 San Francisco, California 94105
 10 Telephone: (415) 268-5602
 11 Facsimile: (415) 744-0134
 12 E-Mail: Gina.Tomaselli@ssa.gov

13 **UNITED STATES DISTRICT COURT**
 14 **DISTRICT OF NEVADA**

15 AMIRIS ESTRELLA,
 16 Plaintiff,
 17 vs.

18 NANCY A. BERRYHILL,
 19 Acting Commissioner of Social Security,
 20 Defendant.

21 } CIVIL NO. 2:18-cv-00460-APG-NJK
 22 } **DEFENDANT’S UNOPPOSED**
 23 } **MOTION FOR EXTENSION OF**
 24 } **TIME**

25 IT IS HEREBY STIPULATED, by and between Amiris Estrella (Plaintiff) and Nancy A.
 26 Berryhill, Acting Commissioner of Social Security (Defendant), by and through their respective counsel
 27 of record, that Defendant shall have an extension of time of thirty (30) days to deliver her Motion for
 28 Summary Judgment and in Opposition to Plaintiff’s Motion for Summary Judgment. The current due
 date is September 4, 2018. The new due date will be October 4, 2018. The parties further stipulate that
 all other dates will be extended accordingly, and Plaintiff’s reply will be due to Defendant by October
 23, 2018.

This is the first extension of time requested by Defendant in the above-captioned matter.
 Defendant requests this extension because the attorney responsible for briefing this case has an
 unusually heavy workload at this time. This request is made in good faith with no intention to unduly
 delay the proceedings. Counsel for Defendant conferred with Plaintiff’s counsel, who has no opposition

1 to this motion, on August 24, 2018. It is therefore respectfully requested that Defendant be granted a
2 thirty (30) day extension of time to respond to Plaintiff's motion, up to and including October 4, 2018.
3

4 Respectfully submitted,

5 Dated: August 24, 2018

6 By: /s/ Hal Taylor *
7 JOSHUA R. HARRIS
8 Richard Harris Law Firm
9 (*by verbal authorization on 8/24/18)

10 Dated: August 24, 2018

11 DANIEL G. BOGDEN
12 United States Attorney
13 District of Nevada

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

17 Attorneys for Defendant

18 IT IS SO ORDERED:

19 
20 _____
21 THE HONORABLE NANCY J. KOPPE
22 UNITED STATES MAGISTRATE JUDGE

23 DATE: August 24, 2018
24 _____
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