

1 DAYLE ELIESON  
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 2 District of Nevada  
 TINA NAICKER, CSBN 252766  
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6 Attorneys for Defendant

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

12 PATRICK CANNON,	)	
	)	Case No. 2:18-cv-00470-KJD-CWH
13 Plaintiff,	)	
	)	
14 v.	)	<b>JOINT STIPULATION FOR EXTENSION OF</b>
	)	<b>TIME AND [PROPOSED ORDER]</b>
15 NANCY A. BERRYHILL,	)	
Acting Commissioner of Social Security,	)	<b>(FIRST REQUEST)</b>
16	)	
Defendant.	)	

17  
 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 Remand be extended from November 8, 2018 to  
 20 **December 8, 2018**. This is Defendant’s first request for extension. Good cause exists to grant  
 21 Defendant’s request for extension. Counsel was out of the office for nearly three weeks on  
 22 intermittent sick leave for the flu/acute pneumonia. Counsel also had a migraine for the last two days  
 23 which impairs her vision. Counsel also has over 75+ active matters, which requires two or more  
 24 dispositive motions a week until late-December. In addition, Counsel has active civil rights and  
 25 representative misconduct matters that require immediate investigation. Counsel also has a Ninth  
 26

1 Circuit brief due in mid-November, which requires multiple levels of review. Due to Counsel's  
2 unexpected leave and heavy workload, Counsel needs additional time to adequately review the  
3 transcript and properly respond to Plaintiff's Motion for Remand. Defendant makes this request in  
4 good faith with no intention to unduly delay the proceedings. The parties further stipulate that the  
5 Court's Scheduling Order shall be modified accordingly.  
6

7 Respectfully submitted,

8 Dated: November 7, 2018

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

11  
12 Dated: November 7, 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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18  
19 **ORDER**

20 APPROVED AND SO ORDERED:

21  
22  
23 DATED: November 13, 2018

  
HON. CARL V. 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 FOR EXTENSION OF TIME AND [PROPOSED ORDER]** on the date  
4 and via the method of service identified below:

5 **CM/ECF:**

6 Cyrus Safa  
7 Law Offices of Lawrence D. Rohlfing  
8 12631 E. Imperial Highway, Suite C-115  
9 Santa Fe Springs, CA 90670  
10 562-868-5886  
11 Fax: 562-868-5491  
12 Email: cyrus.safa@rohlfinglaw.com

13 Attorneys for Plaintiff

14 Respectfully submitted this 7th day of November 2018,

15 /s/ Tina L. Naicker  
16 TINA L. NAICKER  
17 Special Assistant United States Attorney  
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