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 United States Attorney
 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.)	JOINT STIPULATION FOR EXTENSION OF
)	TIME AND [PROPOSED ORDER]
15 NANCY A. BERRYHILL,)	
Acting Commissioner of Social Security,)	(SECOND REQUEST)
16)	
Defendant.)	

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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 Remand be extended from December 8, 2018 to
 20 **January 8, 2019**. This is Defendant’s second request for extension. Good cause exists to grant
 21 Defendant’s request for extension. Counsel respectfully requests additional time due to her heavy
 22 caseload and upcoming leave. Counsel also has over 75+ active matters, which requires two or more
 23 dispositive motions a week until mid-January. In addition, Counsel has active civil rights and
 24 representative misconduct matters that require immediate investigation. Counsel also has a Ninth
 25 Circuit brief due the same week as the current deadline, which requires multiple levels of review.
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1 Counsel is also expected to be on leave during the first week of December. As such, Counsel needs
2 additional time to adequately review the transcript and properly respond to Plaintiff's Motion for
3 Summary Judgment. Defendant makes this request in good faith with no intention to unduly delay the
4 proceedings. The parties further stipulate that the Court's Scheduling Order shall be modified
5 accordingly.
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8 Respectfully submitted,

9 Dated: November 26, 2018

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

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12
13 Dated: November 26, 2018

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

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

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21 **ORDER**

22 APPROVED AND SO ORDERED:

23
24 DATED: November 27, 2018



HON. CARL J. 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 26th day of November 2018,

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