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 2 District of Nevada
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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,)	(THIRD 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 January 8, 2018 to
 20 **January 29, 2019**. This is Defendant’s third request for extension. Good cause exists to grant
 21 Defendant’s request for extension. On Christmas Day, Counsel’s family members were in a serious
 22 car accident that required hospitalization. As a result, Counsel was unexpectedly out of the office
 23 following the Christmas holiday. Counsel also has over 75+ active matters, which requires two or
 24 more dispositive motions a week until mid-March. Counsel also has a Ninth Circuit brief due on the
 25 same date as the current filing deadline. Due to Counsel’s heavy workload and unexpected leave,
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1 Counsel needs additional time to adequately review the transcript and properly respond to Plaintiff's
2 Motion for Summary Judgment. Defendant makes this request in good faith with no intention to
3 unduly delay the proceedings. The parties further stipulate that the Court's Scheduling Order shall be
4 modified accordingly.
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7 Respectfully submitted,

8 Dated: January 8, 2019

/s/ *Cyrus Safa
(*as authorized by email on January 7, 2019)
CYRUS SAFA
Attorney for Plaintiff

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12 Dated: January 8, 2019

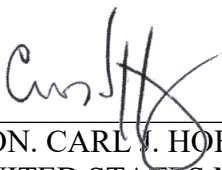
DAYLE ELIESON
United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

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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
23 DATED: January 9, 2019


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 7th day of January 2019

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