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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 SHARONE RANDOLPH,)	Case No. 2:18-cv-00555-JAD-PAL
13 Plaintiff,)	
14 v.)	JOINT STIPULATION FOR EXTENSION OF
15 NANCY A. BERRYHILL,)	TIME AND [PROPOSED ORDER]
Acting Commissioner of Social Security,)	
16 Defendant.)	

17 IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that
 18 the time for responding to Plaintiff’s Motion for Remand be extended from September 13, 2018 to
 19 **October 29, 2018**. This is Defendant’s first request for extension. Good cause exists to grant
 20 Defendant’s request for extension. Counsel was recently out on intermittent medical leave and
 21 bereavement leave for the past few months. Counsel has over 75+ active matters, which requires two
 22 or more dispositive motions a week until mid-September. In addition, Counsel has active civil rights
 23 and representative misconduct matters that require immediate investigation. Counsel also has a Ninth
 24 Circuit brief due on October 1, 2018, which requires multiple levels of review. Due to Counsel’s
 25 unexpected leave, Counsel became behind on her heavy workload. As such, Counsel needs additional
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1 time to adequately review the transcript and properly respond to Plaintiff's Motion for Summary
2 Judgment. Counsel for Defendant is also expected to be out of the office from September 3, 2018
3 through September 9, 2018 and September 21, 2018 through September 27, 2018. Defendant makes
4 this request in good faith with no intention to unduly delay the proceedings. The parties further
5 stipulate that the Court's Scheduling Order shall be modified accordingly.
6

7 Respectfully submitted,

8 Dated: September 13, 2018

/s/ *Cyrus Safa
(*as authorized by email on September 13, 2018)
CYRUS SAFA
Attorney for Plaintiff

11
12 Dated: September 13, 2018

MCGREGOR W. SCOTT
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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23 DATED: September 17, 2018


HON. PEGGY A. LEEN
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:**

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7 Cyrus Safa
8 Law Offices of Lawrence D. Rohlfiing
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22 Attorneys for Plaintiff

23
24 Respectfully submitted this 13th day of September 2018,

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26
/s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant United States Attorney