

1 DAYLE ELIESON  
 United States Attorney  
 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.	)	<b>JOINT STIPULATION FOR EXTENSION OF</b>
15 NANCY A. BERRYHILL,	)	<b>TIME AND [PROPOSED ORDER]</b>
16 Acting Commissioner of Social Security,	)	<b>(SECOND REQUEST)</b>
17 Defendant.	)	

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 29, 2018 to  
 20 **December 13, 2018**. This is Defendant’s third request for extension. Good cause exists to grant  
 21 Defendant’s request for extension. Counsel has a family emergency on the date of the current filing  
 22 deadline. Counsel also has over 75+ active matters, which requires two or more dispositive motions a  
 23 week until mid-January. In addition, Counsel has active civil rights and representative misconduct  
 24 matters that require immediate investigation. Counsel also has a Ninth Circuit brief due next week,  
 25 which requires multiple levels of review. Due to Counsel’s unexpected leave, Counsel became behind  
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1 on her heavy workload. As such, Counsel needs additional time to adequately review the transcript  
2 and properly respond to Plaintiff's Motion for Summary Judgment. Defendant makes this request in  
3 good faith with no intention to unduly delay the proceedings. The parties further stipulate that the  
4 Court's Scheduling Order shall be modified accordingly.

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6 Respectfully submitted,

7 Dated: November 29, 2018

/s/ \*Cyrus Safa  
(\*as authorized by email on November 29, 2018)  
CYRUS SAFA  
Attorney for Plaintiff

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10  
11 Dated: November 29, 2018

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

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

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18 **ORDER**

19 APPROVED AND SO ORDERED:

20  
21  
22 DATED: December 4, 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:**

6  
7 Cyrus Safa  
8 Law Offices of Lawrence D. Rohlfiing  
9 12631 E. Imperial Highway, Suite C-115  
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15 Gerald Welt  
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20 Fax: 702-684-5157  
21 Email: gmwesq@weltlaw.com

22 Attorneys for Plaintiff

23  
24 Respectfully submitted this 29th day of November 2018,

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