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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 CHRISTOPHER VANGEMERT,)
13 Plaintiff,)
14 v.)
15 NANCY A. BERRYHILL,)
Acting Commissioner of Social Security,)
16 Defendant.)

Case No. 2:18-cv-00657-JCM-NJK

**~~JOINT STIPULATION AND PROPOSED~~
ORDER FOR EXTENSION OF TIME FOR
DEFENDANT TO RESPOND TO PLAINTIFF'S
MOTION FOR REMAND**

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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 Summary Judgment be extended from October 4,
20 2018 to **October 18, 2018**. This is Defendant's second request for extension. Counsel is not feeling
21 well on the date of the current filing deadline and is getting migraine symptoms, which impairs her
22 vision. Counsel apologizes for the belated request, but cannot control the onset of her migraines and
23 made this request as soon as practicable. Due to current workload demands and unanticipated leave,
24 Counsel needs additional time to adequately review the transcript and properly respond to Plaintiff's
25 Motion for Remand. Defendant makes this request in good faith with no intention to unduly delay the
26

1 proceedings. The parties further stipulate that the Court's Scheduling Order shall be modified
2 accordingly.

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4 Respectfully submitted,

5 Dated: October 4, 2018

6 /s/ *Joshua Harris
7 (*as authorized by email on October 4, 2018)
8 JOSHUA HARRIS
9 Attorney for Plaintiff

10 Dated: October 4, 2018

11 DAYLE ELIESON
12 United States Attorney
13 DEBORAH LEE STACHEL
14 Regional Chief Counsel, Region IX
15 Social Security Administration

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

20 **ORDER**

21 APPROVED AND SO ORDERED:

22 DATED: October 5, 2018

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24 _____
25 HON. NANCY J. KOPPE
26 UNITED STATES MAGISTRATE JUDGE