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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 18,
 20 2018 to **October 25, 2018**. This is Defendant's third request for extension. Counsel has been out of
 21 the office on sick leave due to the flu/cold. Counsel apologizes for the belated request, but did not
 22 anticipate taking additional sick leave and made this request as soon as practicable. Due to current
 23 workload demands and unanticipated leave, Counsel needs additional time to adequately review the
 24 transcript and properly respond to Plaintiff's Motion for Remand. Defendant makes this request in
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1 good faith with no intention to unduly delay the proceedings. The parties further stipulate that the
2 Court's Scheduling Order shall be modified accordingly.
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4 Respectfully submitted,

5 Dated: October 17, 2018

6 /s/ *Joshua Harris
7 (*as authorized by email on October 17, 2018)
8 JOSHUA HARRIS
9 Attorney for Plaintiff

10 Dated: October 17, 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 18, 2018

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