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 9 WANDA R. CLEMONS

10 **UNITED STATES DISTRICT COURT**
 11 **DISTRICT OF NEVADA**

12 WANDA R. CLEMONS)	Case No.: 2:18-cv-00824-JAD-PAL
)	
13 Plaintiff,)	STIPULATION TO EXTEND TIME
14 v.)	TO FILE MOTION FOR REMAND
)	
15 NANCY A. BERRYHILL,)	(FIRST REQUEST)
Acting Commissioner of Social)	
Security,)	
)	
16 Defendant.)	

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 18
 19 Plaintiff Wanda R. Clemons and Defendant Nancy A. Berryhill, Acting
 20 Commissioner of Social Security, through their undersigned attorneys, stipulate,
 21 subject to this court’s approval, to extend the time by 45 days from November 23,
 22 2018 to January 7, 2019 for Plaintiff to file a Motion for Remand, with all other
 23 dates in the Court’s Scheduling order extended accordingly. This is Plaintiff's first
 24 request for an extension. This request is made at the request of Plaintiff’s counsel
 25 to allow additional time to fully research the issues presented. Counsel's mother
 26 has been fighting a losing battle with Systemic Lupus Erythematosus that has

1 required multiple surgeries these past two years due inflammation affecting the
2 kidneys and lungs. Counsel's mother has undergone several kidney surgeries since
3 February 11, 2018. Counsel's mother continues with her recovery process that has
4 required Counsel to take time off to attend her mother's financial and physical
5 needs which has impacted a heavy briefing and hearing calendar. In addition,
6 Counsel has been fighting off a flu for since last week.

7 This is not an ordinary circumstance for Counsel and Counsel sincerely
8 apologizes to the Court for any inconvenience this may have cause. Counsel's firm
9 has hired another associate to help Counsel during this difficult time. Counsel
10 sincerely apologizes to the court and its staff for any inconvenience this may have.

11 DATE: November 29, 2018

Respectfully submitted,

12 LAWRENCE D. ROHLFING

13 /s/ *Cyrus Safa*

14 BY: _____

Cyrus Safa

15 Attorney for plaintiff Wanda R. Clemons

16
17 DATE: November 29, 2018

DAYLE ELIESON

18 United States Attorney

19 /s/ *Asim Modi*

20 BY: _____

Asim Modi

21 Special Assistant United States Attorney
22 Attorneys for defendant Nancy A. Berryhill

23 Acting Commissioner of Social Security

|*authorized by e-mail|

24
25 **IT IS SO ORDERED** this 21st day of December, 2018.

26 

Peggy A. Leen

United States Magistrate Judge

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CERTIFICATE OF SERVICE
FOR CASE NUMBER E 2:18-CV-00824-JAD-PAL

I hereby certify that I electronically filed the foregoing with the Clerk of the Court for this court by using the CM/ECF system on November 29, 2018.

I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

/s/ Cyrus Safa

Cyrus Safa
Attorneys for Plaintiff