

1 MARC V. KALAGIAN
 Attorney at Law
 2 211 East Ocean Boulevard, Suite 420
 Long Beach, California 90802
 3 Marc.kalagian@rksslaw.com

4 Attorney for Plaintiff

5 DANIEL G. BOGDEN, NSBN 2137
 United States Attorney
 6 HOLLY A. VANCE
 Assistant United States Attorney
 7 APRIL A. ALONGI, VSBN 76459
 Special Assistant United States Attorney
 8 160 Spear Street, Suite 800
 9 San Francisco, CA 94105
 Phone: 415-977-8954
 10 Fax: 415-744-0134
 april.alongi@ssa.gov

11 Attorneys for Defendant

12
 13 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

14 DANYL W. BARBOUR,)	Case No: 3:15-cv-00380-HDM-WGC
)	
15 Plaintiff)	
)	
16 v.)	JOINT STIPULATION FOR EXTENSION
)	OF TIME TO FILE DEFENDANT’S
)	CROSS-MOTION TO AFFIRM
17 CAROLYN W. COLVIN, Acting)	
18 Commissioner of Social Security,)	
)	
19 Defendant.)	
)	

20
 21 Plaintiff Danyl W. Barbour (Plaintiff) and Defendant Carolyn W. Colvin, Acting
 22 Commissioner of Social Security (the Commissioner), stipulate, with the approval of this Court,
 23 to an extension of time to file the Commissioner’s Cross-Motion To Affirm by thirty-one days
 24 from January 22, 2016 to February 22, 2016. This is the Commissioner’s first request for an
 25 extension.
 26

1 There is good cause because Commissioner's counsel was assigned a new employment
2 case this week, which requires imminent attention. Further, counsel has three other briefs due
3 this week, an upcoming 9th Circuit oral argument, and a brief in a different 9th Circuit case due
4 to be filed in less than three weeks. The Commissioner needs additional time to respond to the
5 issues Plaintiff raised in his Motion For Reversal And/Or Remand. Plaintiff has no objection.

6
7 Respectfully submitted,

8 Date: January 22, 2016

9 By: /s/* Marc V. Kalagian
10 MARC V. KALAGIAN
11 Attorney at Law
12 *by email authorization on 1/21/16

Attorney for Plaintiff

13 Date: January 22, 2016

14 DANIEL G. BOGDEN
15 United States Attorney
16 HOLLY A. VANCE
17 Assistant United States Attorney

18 By: /s/ April A. Alongi
19 APRIL A. ALONGI
20 Special Assistant United States Attorney

Attorneys for Defendant

21 IT IS SO ORDERED.

22
23
24 DATED: January 22, 2016.

25 William G. Cobb
26 WILLIAM G. COBB
UNITED STATES MAGISTRATE JUDGE