

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

JOHN C. BOYDEN, SBN 3917
Esquire
P.O. Box 3559
Reno, Nevada 89505
Phone: 775-786-3930
jboyden@etsreno.com

Attorney for Plaintiff

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

Attorneys for Defendant

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ANTONIO V. MURO,
Plaintiff

v.

CAROLYN W. COLVIN, Acting
Commissioner of Social Security,
Defendant.

) Case No: 3:16-cv-00090-MMD-VPC
)
)
) **JOINT STIPULATION FOR EXTENSION**
) **OF TIME TO FILE DEFENDANT'S**
) **CROSS-MOTION TO AFFIRM**
)
) **(Second Request)**
)
)
)

1 Plaintiff Antonio V. Muro (Plaintiff) and Defendant Carolyn W. Colvin, Acting
2 Commissioner of Social Security (the Commissioner), stipulate, with the approval of this Court,
3 to an extension of time to file the Commissioner's Cross-Motion To Affirm by thirty days from
4 October 24, 2016 to November 23, 2016, with all other dates in this Court's Order Concerning
5 Review Of Social Security Cases extended accordingly. This is the Commissioner's second
6 request for an extension.¹

7 ///

8 ///

9 ///

10 ///

11 ///

12 ///

13 ///

14 ///

15 ///

16 There is good cause because, since the Commissioner's prior extension, counsel has been
17 handling a large number of District Court and Ninth Circuit cases in addition to this one, with five
18 briefs due within the next twenty-eight days. Additionally, the Commissioner's counsel has had
19 numerous other deadlines, including five District Court briefs and pleadings filed, including one
20 cross-motion to affirm filed Friday, October 21, 2016; numerous half-day witness preparation
21 sessions in advance of an upcoming hearing; a motion to dismiss in an administrative employment
22 case; and multiple mentoring and reviewing duties in the Office of the General Counsel. As a
23 result, the Commissioner needs additional time to properly respond to the issues Plaintiff raised in
24 his Motion For Remand. Counsel apologizes for the delay and makes this request in good faith.

25 ¹ This Court granted Plaintiff's request for an extension on June 8, 2016 and Plaintiff timely filed
26 his motion on August 23, 2016.

1 Plaintiff has no objection.

2

3

Respectfully submitted,

4

5 Date: October 24, 2016

By: /s/* John C. Boyden
JOHN C. BOYDEN
*by email authorization on 10/24/16

6

7

Attorneys for Plaintiff

8

9 Date: October 24, 2016

DANIEL G. BOGDEN
United States Attorney
HOLLY A. VANCE
Assistant United States Attorney

10

11

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

12

13

Attorneys for Defendant

14

15

16

17

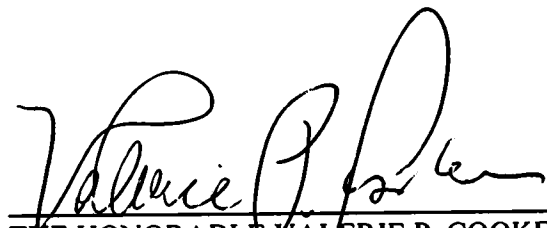
IT IS SO ORDERED.

18

19

20

21 DATE: 10/31/16



THE HONORABLE VALERIE P. COOKE
United States Magistrate Judge

22

23

24

25

26

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

DEFENDANT'S CERTIFICATE OF SERVICE

I certify that I caused the Joint Stipulation For Extension Of Time To File Defendant's Cross-Motion To Affirm (Second Request) to be served, via CM/ECF notice, on:

JOHN C. BOYDEN
Esquire
jboyden@etsreno.com

Date: October 24, 2016

DANIEL G. BOGDEN
United States Attorney
HOLLY A. VANCE
Assistant United States Attorney

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

Attorneys for Defendant