

1 RICHARD E. DONALDSON, ESQ., CHTD.
 RICHARD E. DONALDSON, ESQ.
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 2300 West Sahara Ave., Suite 800
 3 Las Vegas, NV 89102
 (702) 382-6370
 4 Attorney for Plaintiff

5 UNITED STATES DISTRICT COURT
 6 DISTRICT OF NEVADA

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 9 PATRICIA J. SHANNON)
)
 10 Plaintiff,)
)
 11 vs.)
)
 12)
)
 13 MICHAEL J. ASTRUE,)
 COMMISSIONER OF)
 14 SOCIAL SECURITY,)
)
 15 Defendant.)

CASE NO.: 2:11-CV-0394 JCM-CWH

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 17 **PLAINTIFF'S UNOPPOSED MOTION FOR EXTENSION OF**
 18 **TIME TO FILE A REPLY TO DEFENDANT'S MOTION TO AFFIRM,**
 19 **MEMORANDUM IN SUPPORT OF AND IN OPPOSITION TO**
 20 **PLAINTIFF'S MOTION FOR REVERSAL AND/OR REMAND**

21 **(First Request)**

22 Plaintiff, PATRICIA J. SHANNON by and through her attorney of record, RICHARD
 23 E. DONALDSON, ESQ., respectfully requests an extension of time of two additional
 24 business days, to and including, November 9, 2011, in which to file a Reply to
 25 Defendant's Motion to Affirm, Memorandum in Support of and in Opposition to Plaintiff's
 Motion for Reversal and/or Remand.

26 This request is necessary so that the Plaintiff can finish the writing of the Reply,
 27 which has taken much longer than anticipated. At the present time, Plaintiff's deadline to
 28 file the Reply is Saturday, November 5, 2011, and counsel has been unable to finish the

1 reply before the close of Court's business today. This request is being filed as a Motion as
2 the undersigned counsel has been unable to contact Carlos A. Gonzalez, Assistant United
3 States Attorney and counsel of record for the Defendant. Mr. Gonzalez and undersigned
4 counsel have a standing agreement to stipulate to motions for an extension of time, and on
5 information and belief, Mr. Gonzalez does not oppose this Motion.

6 This is the first request for an extension of time to file a Reply.

7 DATED this 11th day of April, 2011.

8 Respectfully submitted,

9 RICHARD E. DONALDSON, ESQ., CHTD.

10 By: _____
11 RICHARD E. DONALDSON, ESQ., CHTD.

12 IT IS SO ORDERED:

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14 _____
15 UNITED STATES JUDGE

16 DATED: _____
17 November 7, 2011
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