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2 District of Nevada  
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Attorneys for the Defendant.  
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11 **UNITED STATES DISTRICT COURT**

12 **DISTRICT OF NEVADA**

13 WILLIAM E. AVELLO,

14 Plaintiff,

15 v.

16 CAROLYN W. COLVIN, Acting Commissioner  
Of Social Security,

17 Defendant.  
18

CIVIL NO. 2:13-cv-00504-JAD-GWF

**DEFENDANT'S UNOPPOSED  
MOTION TO EXTEND TIME TO  
RESPOND TO PLAINTIFF'S MOTION  
FOR REMAND  
(FIRST REQUEST)**

19 DEFENDANT CAROLYN W. COLVIN, Acting Commissioner of Social Security (Defendant)  
20 hereby moves this Honorable Court to grant her unopposed motion for a 60-day extension of time to file  
21 her response and/or cross-motion to Plaintiff William E. Avello's motion for reversal or remand. This is  
22 the first extension of time requested by Defendant. Defendant requires this extension of time because  
23 the volume of cases assigned to the Social Security Administration Office of General Counsel Assistant  
24 Regional Counsel responsible for this case is such that she will not be able to complete the brief in a  
25 timely fashion. Defendant will transfer this case to another attorney in the Social Security  
26 Administration's Office of General Counsel. However, the new attorney will need additional time to

1 adequately assess and address the arguments that Plaintiff has raised in his motion for summary  
2 judgment.

3 The current due date for Defendant's response/cross-motion is January 8, 2014. If this  
4 unopposed motion is granted, the new due date will be March 10, 2014.

5 The parties have further agreed that the Court's Scheduling Order shall be modified accordingly.

6 Dated: January 7, 2014.

7 Respectfully submitted,

8 DANIEL G. BOGDEN  
9 United States Attorney

10 /s/ Blaine T. Welsh  
11 BLAINE T. WELSH  
12 Assistant United States Attorney

11 OF COUNSEL:

12 DONNA L. CALVERT  
13 Acting Regional Chief Counsel, Region IX  
14 Social Security Administration

15 SHARON LAHEY  
16 Assistant Regional Counsel  
17 Social Security Administration, Region IX

18 **IT IS SO ORDERED:**

19   
20 UNITED STATES MAGISTRATE JUDGE

21 Dated: \_\_ January 8, 2014

1 **CERTIFICATE OF SERVICE**

2 I, Blaine T. Welsh, certify that the following individuals were served with a copy of the  
3 **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date and via the method of service  
identified below:

4 **CM/ECF:**

5 Heather Freeman  
6 55 W. Monroe St., Suite 2440  
7 Chicago IL, 60603  
8 Email: [hfreeman@ddbchicago.com](mailto:hfreeman@ddbchicago.com)

9 Hal Taylor  
10 223 Marsh Avenue  
11 Reno, NV 89509  
12 Email: [haltaylorlawyer@gbis.com](mailto:haltaylorlawyer@gbis.com)

13 Dated this 7th day of January 2014.

14 */s/ Blaine T. Welsh*  
15 BLAINE T. WELSH  
16 Assistant United States Attorney  
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