

1 DANIEL G. BOGDEN
2 United States Attorney
3 District of Nevada

3 CAROLYN CHEN
4 Special Assistant United States Attorney
5 160 Spear Street, Suite 800
6 San Francisco, CA 94105-1545
7 Telephone (415) 977-8956
8 Facsimile (415) 744-0134
9 Email: carolyn.chen@ssa.gov

10 Attorneys for Defendant

11 UNITED STATES DISTRICT COURT
12 DISTRICT OF NEVADA

13 WILLIAM E. AVELLO,

14 Plaintiff,

15 vs.

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

18 Defendant.

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

20) **DEFENDANT'S AMENDED SECOND**
21) **UNOPPOSED MOTION TO EXTEND**
22) **TIME TO RESPOND TO**
23) **PLAINTIFF'S MOTION FOR**
24) **REMAND**

25 DEFENDANT CAROLYN W. COLVIN, Acting Commissioner Of Social Security (Defendant)
26 hereby moves this Honorable Court to grant her unopposed motion for a 30-day extension of time to file
27 her response and/or cross-motion to Plaintiff William E. Avello's motion for reversal or remand. This is
28 the second extension of time requested by Defendant. Defense counsel requires this extension of time
so that she may continue to work with her client concerning the possibility of settlement. The current
due date is March 10, 2014. The new due date will be April 9, 2014.

29 ///

30 ///

31 ///

32 AMENDED MOT. FOR EXTENSION & PROPOSED ORDER

(CASE NO. 2:13-cv-00504-JAD-GWF)

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

2 Respectfully submitted,

3 Dated: March 7, 2014

DANIEL G. BOGDEN
United States Attorney

5 By: /s/ Carolyn Chen
6 CAROLYN CHEN
Special Assistant United States Attorney

7 OF COUNSEL:

8 DONNA L. CALVERT
9 Acting Regional Chief Counsel, Region IX
10 Social Security Administration

11 SHARON LAHEY
12 Assistant Regional Counsel
Social Security Administration, Region IX

13 **ORDER**

14 PURSUANT TO STIPULATION, IT IS SO ORDERED.

15 Dated: March 10, 2014

16 
17 HON. GEORGE FOLEY, JR.
18 UNITED STATE MAGISTRATE JUDGE