- 1		
1 2 3 4 5 6	Marc V. Kalagian Attorney at Law: 4460 211 East Ocean Boulevard, Suite 420 Lor Tel: (562)437-7006 Fax: (562)432-2935 E-Mail: rohlfing.kalagian@rksslaw.com Attorneys for Plaintiff JESUS LOPEZ-BAUTISTA	ng Beach, CA 90802
7 8	LINITED STATES	DISTRICT COURT
9		
10	DISTRICT OF NEVADA	
11	JESUS LOPEZ-BAUTISTA	Case No.: 2:14-cv-00904-RCJ-GWF
12	Plaintiff,)	UNOPPOSED MOTION TO EXTEND TIME TO FILE MOTION FOR
13)	REMAND AND/OR REVERSAL
14	CAROLYN W. COLVIN, Acting (Commissioner of Social Security.	(SECOND REQUEST)
15	Defendant.	
16		
17		
18	Plaintiff Jesus Lopez-Bautista and	Defendant Carolyn W. Colvin, Acting
19	Commissioner of Social Security, through their undersigned attorneys, stipulate,	
20		
21	subject to this court's approval, to extend the time by 45 days from November 10,	
$\begin{bmatrix} 22 \\ \end{bmatrix}$	2014 to December 25, 2014 for Plaintiff to file her Motion for Remand and/or	
	Reversal, with all other dates in the Court's Order Concerning Review Of Social	
23	Security Cases extended accordingly. This is Plaintiff's second request for an	
24	extension.	
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1	This request is made at the request of Plaintiff's counsel due to a delay in receiving		
2	the hearing transcript that was inadvertently omitted from the administrative record		
3	and also due to Plaintiff's counsel heavy briefing schedule. Plaintiff's Counsel		
4	contacted April Alongi, counsel of record for defendant, and Ms. Alongi does not		
5	oppose this motion.		
6			
7	DATE: November 13, 2014 Respectfully submitted,		
8	ROHLFING & KALAGIAN, LLP		
9	/s/ Marc V. Kalagian		
10	BY: Marc V. Kalagian Attorney for plaintiff Mr. Joseph Longz Boutists		
11	Attorney for plaintiff Mr. Jesus Lopez-Bautista		
12			
13	DATE: November 13, 2014		
14	DANIEL G. BOGDEN United States Attorney		
15	S April A. Alongi		
16	BY:		
17	APRIL A. ALONGI Special Assistant United States Attorney Attorneys for defendant Carolyn W. Colvin		
18	*authorized by e-mail		
19			
20	IT IS SO ORDERED: Leonge Foley J.		
21	UNITED STATES MAGISTRATE JUDGE		
22	DATED: November 14, 2014		
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24			
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