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3 District of Nevada

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11 Attorneys for Defendant

12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 CHARLES ASBERGER,
15 Plaintiff,

16 v.

17 CAROLYN W. COLVIN,
18 Acting Commissioner of Social Security,
19 Defendant.

) Case No. 1:14-cv-01209-RFB-PAL

) **UNOPPOSED MOTION FOR**
) **EXTENSION OF TIME**
) **(FIRST REQUEST)**

20 Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (“Defendant”)
21 respectfully requests that the Court extend the time for Defendant to file her Cross-Motion to Affirm by
22 30 days from March 2, 2015, to and including April 1, 2015.

23 Defendant respectfully requests this extension due to a heavy workload, including several other
24 district court cases, despite due diligence. Defendant therefore needs additional time to properly address
25 the issues Plaintiff raises in his Motion for Reversal and/or Remand. This request is made in good faith
26 with no intention to unduly delay the proceedings.

1 On February 26, 2015, Counsel for Defendant conferred with Plaintiff's counsel who had no
2 objection to this motion.

3 Respectfully submitted this 26th day of February 2015.

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5 DANIEL G. BOGDEN
United States Attorney

6 /s/ Lynn M. Harada
7 LYNN M. HARADA
Special Assistant United States Attorney

8
9 OF COUNSEL:

10 DONNA L. CALVERT
11 Regional Chief Counsel, Region IX

12
13 IT IS SO ORDERED:

14 
15 UNITED STATES MAGISTRATE JUDGE

16 DATED: March 5, 2015

1 **CERTIFICATE OF SERVICE**

2 I, **LYNN M. HARADA**, certify that the following individual was served with a copy of the
3 **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date and via the method of service
4 identified below:

4 **CM/ECF:**

5 Marc V. Kalagian
6 Rohlfing & Kalagian, LLP
7 211 E. Ocean Blvd., Suite 420
8 Long Beach, CA 90802
9 Marc.Kalagian@rksslaw.com

8 Dated this 26th day of February 2015.

10 /s/ Lynn M. Harada
11 **LYNN M. HARADA**
12 Special Assistant United States Attorney
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