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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.)

20 Case No. 2:14-cv-01209-RFB-PAL

21 **UNOPPOSED MOTION FOR**
22 **EXTENSION OF TIME**
23 **(SECOND REQUEST)**

24 Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (“Defendant”)
25 respectfully requests that the Court extend the time for Defendant to file her Cross-Motion to Affirm by
26 30 days from April 1, 2015, to and including May 1, 2015.

Defendant respectfully requests this extension due to a heavy workload, including several other
district court cases, despite due diligence, and because Defendant was out of the office for several days.
Defendant therefore needs additional time to prepare a response in this matter and properly address the

1 issues Plaintiff raises in his motion. This request is made in good faith with no intention to unduly delay
2 the proceedings. This is Defendant's second request for an extension.

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4 On April 1, 2015, Counsel for Defendant conferred with Plaintiff's counsel who had no objection
5 to this motion.

6 Defendant sincerely apologizes to the Court for any inconvenience caused by this delay.

7 Respectfully submitted this 1st day of April 2015.

8 DANIEL G. BOGDEN
9 United States Attorney

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

13 OF COUNSEL:

14 DONNA L. CALVERT
15 Regional Chief Counsel, Region IX

16
17 IT IS SO ORDERED:

18 
19 UNITED STATES MAGISTRATE JUDGE

20 DATED: April 7, 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 (SECOND REQUEST)** on the date and via
4 the method of service 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 1st day of April 2015.

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