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10 UNITED STATES DISTRICT COURT

11 DISTRICT OF NEVADA

12 ZEIDY M. PONCE CONEJO,

13 Plaintiff,

14 vs.

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

17 Defendant.

) CIVIL NO. 2:14-cv-01557-MMD-PAL

) **DEFENDANT’S UNOPPOSED**
) **MOTION TO EXTEND TIME TO**
) **RESPOND TO PLAINTIFF’S**
) **MEMORANDUM IN SUPPORT OF**
) **RELIEF REQUESTED IN**
) **PLAINTIFF’S COMPLAINT**

18
 19 CAROLYN W. COLVIN, Acting Commissioner Of Social Security (Defendant) hereby moves
 20 this Honorable Court to grant her unopposed motion for a 14-day extension of time to file her response
 21 and/or cross-motion to Zeidy M. Ponce Conejo’s (Plaintiff) Memorandum In Support Of Relief
 22 Requested In Plaintiff’s Complaint (the Motion) (Docket No. 18). This is the first extension of time
 23 requested in the above-captioned matter. Defense counsel requests this additional time because she
 24 inadvertently incorrectly calendared the date for Defendant to respond to the Motion and requires
 25 additional time to adequately address the issues Plaintiff raises in the Motion. Defense counsel
 26 apologizes for any inconvenience. The current deadline is May 11, 2015. The new deadline will be

28 MOTION FOR EXTENSION & PROPOSED ORDER (CASE No. 2:14-cv-01557-MMD-PAL)

1 May 25, 2015. Any reply thereto will be due June 15, 2015. The parties have further agreed that the
2 Court's Scheduling Order shall be modified accordingly.

3 Respectfully submitted,

4 Dated: May 12, 2015

DANIEL G. BOGDEN
United States Attorney

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7 By: /s/ Sharon Lahey
8 SHARON LAHEY
ASSISTANT REGIONAL COUNSEL

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10 **ORDER**

11 PURSUANT TO STIPULATION, IT IS SO ORDERED. DEFENDANT SHALL FILE HER
12 RESPONSE TO PLAINTIFF'S MEMORANDUM IN SUPPORT OF RELIEF REQUESTED IN
13 PLAINTIFF'S COMPLAINT ON OR BEFORE MAY 25, 2015. ANY REPLY THERETO SHALL BE
14 FILED ON OR BEFORE JUNE 15, 2015.

15 Dated: May 18, 2015

16 Peggy A. Leen
17 HON. PEGGY A. LEEN
UNITED STATES MAGISTRATE JUDGE

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14 Attorneys for DEFENDANT

15 UNITED STATES DISTRICT COURT
16 DISTRICT OF NEVADA

17 ZEIDY M. PONCE CONEJO,

18 Plaintiff,

19 vs.

20 CAROLYN W. COLVIN, Acting Commissioner
21 Of Social Security,

22 Defendant.

23) CIVIL NO. 2:14-cv-01557-MMD-PAL

24) **CERTIFICATE OF SERVICE**

25 I, Sharon Lahey, Assistant Regional Counsel, hereby certify that the following individual
26 was served a copy of the foregoing **DEFENDANT'S UNOPPOSED MOTION TO EXTEND TIME**
27 **TO RESPOND TO PLAINTIFF'S MEMORANDUM IN SUPPORT OF RELIEF REQUESTED**
28 **IN PLAINTIFF'S COMPLAINT** on May 12, 2015:

CM/ECF:

Marc V. Kalagian, Esq.
Rohlfing & Kalagian, LLP
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Long Beach, California 90802
E-mail: rohlfing.kalagian@rksslaw.com

Dated this 12th day of May 2015

/s/ Sharon Lahey

SHARON LAHEY

Assistant Regional Counsel