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8
9 UNITED STATES DISTRICT COURT
10 DISTRICT OF NEVADA

11 RUSTY W. BESEAU,) Case No.: 2:14-cv-01952-GMN-GWF
12)
Plaintiff,) **UNOPPOSED MOTION FOR**
13) **EXTENSION OF TIME**
vs.) **(FIRST REQUEST)**
14)
CAROLYN W. COLVIN,)
15 Acting Commissioner of Social Security,)
16 Defendant.)
17)

18 Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (“Defendant”)
19 respectfully requests that the Court extend the time for Defendant to file her Cross-Motion to
20 Affirm and Response to Plaintiff’s Motion for Reversal, due on **June 26, 2015**, by **28 days**,
21 through and including **July 24, 2015**.

22 There is good cause for this extension because the case is being transferred to another
23 attorney in the Commissioner’s office and needs additional time to complete the responsive
24 pleading. Counsel for Defendant conferred with Plaintiff’s counsel, who has no opposition to
25 this motion, on June 24, 2015.
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Respectfully submitted this 25th day of June 2015.

DANIEL G. BOGDEN
United States Attorney

/s/ Asim H. Modi
ASIM H. MODI
Special Assistant United States Attorney

OF COUNSEL:
DONNA L. CALVERT
Regional Chief Counsel, Region IX

IT IS SO ORDERED:



GEORGE FOLEY, JR.
UNITED STATES MAGISTRATE JUDGE

DATED: June 26, 2015

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CERTIFICATE OF SERVICE

I, **Asim H. Modi**, certify that the following individual was served with a copy of the **UNOPPOSED MOTION FOR EXTENSION OF TIME (FIRST REQUEST)** on the date and via the method of service identified below:

CM/ECF:

Marc V. Kalagian, Esq.
Law Offices of Rohlfing & Kalagian, LLP
211 East Ocean Boulevard, Suite 420
Long Beach, California 90802
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Dated this 25th day of June 2015

//s// Asim H, Modi
ASIM H. MODI
Special Assistant United States Attorney