

1 DANIEL G. BOGDEN
United States Attorney
2 District of Nevada

3 CAROLYN B. CHEN, CSBN 256628
Special Assistant United States Attorney
4 160 Spear Street, Suite 800
5 San Francisco, California 94105
Telephone: (415) 977-8956
6 Facsimile: (415) 744-0134
E-Mail: Carolyn.Chen@ssa.gov

7 Attorneys for Defendant
8
9

10 **UNITED STATES DISTRICT COURT**
11 **DISTRICT OF NEVADA**

12 MATTHEW K. BECK,)

13 Plaintiff,)

14 v.)

15 CAROLYN W. COLVIN,)
Acting Commissioner of Social Security,)

16 Defendant.)
17)

Case No. 2:15-cv-00039-APG-VCF

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

18
19 Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (“Defendant”)
20 respectfully requests that the Court extend the time for Defendant to file her Answer to the Complaint,
21 due on March 13, 2015, by 30 days, through and including April 13, 2015 (April 12, 2015 lands on a
22 Sunday).

23 An extension of time is needed in order to prepare Defendant’s Answer because the
24 Commissioner is still in the process of assembling and finalizing the administrative record. This request
25 is made in good faith with no intention to unduly delay the proceedings.
26

1 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this motion,
2 on March 5, 2015.

3 Respectfully submitted this 5th day of March 2015.

4 DANIEL G. BOGDEN
5 United States Attorney

6 /s/ Carolyn B. Chen
7 CAROLYN B. CHEN
8 Special Assistant United States Attorney

9 OF COUNSEL:

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

12 Dated this 6th of March, 2015

13 IT IS SO ORDERED:

14 

15 _____
16 CAM FERENBACH
17 UNITED STATES MAGISTRATE JUDGE

1 **CERTIFICATE OF SERVICE**

2 I, **CAROLYN B. CHEN**, 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 Kalagian, Law Offices of Rohlfing & Kalagian, LLP**
6 **(Attorney for Plaintiff)**

7 Dated this 5th day of March 2015.

8 */s/ Carolyn B. Chen*
9 **CAROLYN B. CHEN**
10 Special Assistant United States Attorney

11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26