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 9 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

10 DEANNE SZELAP,)
 11)
 Plaintiff,)
 12)
 v.)
 13) Case No.: 2:15-cv-00190-RFB-NJK
 CAROLYN W. COLVIN,)
 14 Acting Commissioner of Social Security,)
 15 Defendant.)
 16)

17 **UNOPPOSED MOTION FOR EXTENSION OF TIME**
(First Request by Defendant)

18 COMES NOW Defendant Carolyn W. Colvin, Acting Commissioner of Social Security
 19 (Defendant), by and through her counsel, Daniel G. Bogden, United States Attorney, and Marla
 20 Letellier, Special Assistant United States Attorney, to request that this Court extend the time to
 21 respond to Plaintiff's Motion for Remand, which was filed on July 20, 2015 by 30 days from August
 22 19, 2015 to September 18, 2015. This is Defendant's first request for an extension of time to respond
 23 to Plaintiff's Motion. Counsel for Defendant contacted Plaintiff's counsel on August 18, 2015, and
 24 Plaintiff does not oppose Defendant's motion. Defendants' current deadline is August 19, 2015.

25 The instant request is not intended to cause delay and is necessary because counsel for
 26 Defendant will be out of the office from August 19, 2015 through August 21, 2015, and because of the

1 heavy workload of counsel for Defendant, who is responsible for briefing dispositive motions in six
2 federal district court cases between August 18, 2015 and August 28, 2015.

3 It is therefore respectfully requested that Defendant be granted a thirty (30) day extension of
4 time to respond to Plaintiff's motion, up to and including September 18, 2015.

5 Dated: August 18, 2015.

6 Respectfully submitted

7 DANIEL G. BOGDEN
8 United States Attorney

9 */s/ Marla K. Letellier*
10 MARLA K. LETELLIER
Special Assistant United States Attorney

11 OF COUNSEL:

12 DEBORAH STACHEL
Acting Regional Chief Counsel

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14
15 IT IS SO ORDERED:

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17 _____
UNITED STATES MAGISTRATE JUDGE

18 DATED: August 19, 2015 _____
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