

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

3 JENNIFER A. KENNEY
4 Special Assistant United States Attorney
CA State Bar 241625
5 160 Spear St., Suite 800
San Francisco, CA 94105
6 Tel: (415) 977-8945
7 Fax: (415) 744-0134
E-mail: jennifer.a.kenney@ssa.gov

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9 Attorneys for Defendant

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

12	MICHAEL A. GARCIA,)	
13)	Case No. 2:15-CV-00200-MMD-CWH
14	Plaintiff,)	
15	v.)	UNOPPOSED MOTION TO EXTEND TIME
16	CAROLYN W. COLVIN,)	FOR DEFENDANT TO FILE HER RESPONSE
17	Acting Commissioner of Social Security,)	TO PLAINTIFF'S MOTION FOR REVERSAL
)	AND/OR REMAND (FIRST REQUEST)
	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 Blaine T.
20 Welsh, Assistant United States Attorney, to request that this Court extend the time to respond to
21 Plaintiff's Motion for Reversal and/or Remand by 30 days, from July 6, 2015 to August 5, 2015. All
22 further deadlines will be extended accordingly. Counsel for Defendant conferred with Plaintiff's
23 counsel, who has no opposition to this motion, on July 6, 2015.

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25 This is Defendant's first request for an extension. The additional time is necessary due to the
26 exceptionally heavy workload of Defendant's attorney assigned to this case. In particular, Defendant's

1 attorney has five Federal District Court briefs due the same week that the instant brief is due, as well
2 as court-ordered deadlines in an employment law matter in litigation before the Equal Employment
3 Opportunity Commission. The additional time will allow Defendant to address the issues Plaintiff has
4 raised in her Motion for Reversal and/or Remand.

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6 Respectfully submitted this 6th day of July 2015.

7 DANIEL G. BOGDEN
8 United States Attorney

9 */s/ Jennifer A. Kenney*
10 JENNIFER A. KENNEY
Special Assistant United States Attorney

11 OF COUNSEL:
12 DONNA L. CALVERT
Regional Chief Counsel, Region IX
13 Social Security Administration
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15 IT IS SO ORDERED:

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17 _____
18 UNITED STATES DISTRICT JUDGE
UNITED STATES MAGISTRATE JUDGE

19 DATED: July 7, 2015
20 _____
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CERTIFICATE OF SERVICE

I, Jennifer A. Kenney, certify that the following individual was served with a copy of the foregoing **UNOPPOSED MOTION TO EXTEND TIME FOR DEFENDANT TO FILE HER RESPONSE TO PLAINTIFF'S MOTION FOR REVERSAL AND/OR REMAND (FIRST REQUEST)** on the date and via the method of service identified below:

CM/ECF:

Joshua R. Harris
Richard Harris Law Firm
801 South Fourth Street
Las Vegas, NV 89101

Marc V. Kalagian
Rohlfing & Kalagian, LLP
211 E. Ocean Blvd., Suite 420
Long Beach, CA 90802

Dated this 6th day of July 2015.

/s/ Jennifer A. Kenney
JENNIFER A. KENNEY
Special Assistant United States Attorney