

1 DANIEL G. BOGDEN
 United States Attorney
 District of Nevada

3 TOVA D. WOLKING, CSBN 259782
 Special Assistant United States Attorney
 4 160 Spear Street, Suite 800
 San Francisco, California 94105
 Telephone: (415) 977-8980
 5 Facsimile: (415) 744-0134
 6 E-Mail: Tova.Wolking@ssa.gov

7 Attorneys for Defendant

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

13 KAREN D. THACKER,)	
)	Case No. 15-cv-00466 RCJ-PAL
14 Plaintiff,)	
)	
15 v.)	UNOPPOSED MOTION FOR
)	EXTENSION OF TIME
16 CAROLYN W. COLVIN,)	(FIRST REQUEST)
Acting Commissioner of Social Security,)	
)	
17 Defendant.)	
)	
18)	

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20 Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (“Defendant”)

21 respectfully requests that the Court extend the time by forty-five (45) days, to January 18, 2016, for

22 Defendant to file her Answer to the Complaint. It is currently due on December 7, 2015.

23 An extension of time is needed to file Defendant’s Answer because the Office of Disability

24 Adjudication and Review (ODAR) requires additional time to prepare and produce the certified

25 administrative record in this case. Additionally, Counsel for Defendant has been assigned to another

1 workload and all of her cases are being reassigned. Thus, an extension of time is required to complete
2 the reassignment. This request is made in good faith with no intention to unduly delay the proceedings.

3 Counsel for Defendant conferred with Plaintiff's counsel, Marc V. Kalagian, on December 3,
4 2015. He stated that he would not oppose this motion.

5 Respectfully submitted this 3rd day of December 2015.

6 DANIEL G. BOGDEN
7 United States Attorney

8 /s/ Tova D. Wolking
9 TOVA D. WOLKING
Special Assistant United States Attorney

10 OF COUNSEL:

11 DEBORAH LEE STACHEL
12 Acting Regional Chief Counsel, Region IX

13
14 IT IS SO ORDERED:

15
16 
17 UNITED STATES MAGISTRATE JUDGE

18 DATED: December 4, 2015

1 **CERTIFICATE OF SERVICE**

2 I, Tova D. Wolking, certify that the following individuals were 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 V. Kalagian
6 Law Offices of Rohlfing & Kalagian, LLP
7 211 East Ocean Boulevard, Suite 420
8 Long Beach, CA 90802

9 Leonard Stone
10 Shook & Stone, Chtd.
11 710 South 4th Street
12 Las Vegas, NIV 89101

13 Dated this 3rd day of December 2015.

14 /s/ Tova D. Wolking
15 TOVA D. WOLKING
16 Special Assistant United States Attorney
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