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7 Attorneys for Defendant

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

13 CONNIE COX-CAIRNS, )  
 )  
 14 Plaintiff, )  
 )  
 15 v. )  
 )  
 16 CAROLYN W. COLVIN, )  
 Acting Commissioner of Social Security, )  
 17 Defendant. )  
 18 )

Case No. 2:15-cv-01077-LDG-NJK

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

19  
 20 Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (“Defendant”)  
 21 respectfully requests that the Court extend the time for her to file her Cross-Motion To Affirm by 30  
 22 days, from December 14, 2015 to January 13, 2016.

23 An extension of time is needed in order to prepare Defendant’s Cross-Motion To Affirm because  
 24 of workload concerns, and that the case was recently reassigned to counsel. This request is made in  
 25 good faith with no intention to unduly delay the proceedings.

1 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this motion,  
2 on December 8, 2015.

3 Respectfully submitted this 9th day of December 2015.

4 DANIEL G. BOGDEN  
5 United States Attorney  
6 BLAINE T. WELSH  
7 Chief, Civil Division

8 /s/ Richard Rodriguez  
9 RICHARD RODRIGUEZ  
10 Special Assistant United States Attorney

11 OF COUNSEL:

12 DEBORAH LEE STACHEL  
13 Acting Regional Chief Counsel, Region IX  
14 STACY WIESBROCK  
15 Assistant Regional Counsel

16 IT IS SO ORDERED:

17   
18 \_\_\_\_\_  
19 UNITED STATES MAGISTRATE JUDGE

20 DATED: December 9, 2015