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8
 9 **UNITED STATES DISTRICT COURT**
DISTRICT OF NEVADA

10	BETTY L. MIERS,)	Case No: 2:15-cv-01229-JAD-VCF
)	
11	Plaintiff)	
)	
12	v.)	DEFENDANT’S MOTION FOR
)	EXTENSION OF TIME TO FILE CROSS-
)	MOTION TO AFFIRM
13	CAROLYN W. COLVIN, Acting)	
	Commissioner of Social Security,)	
14)	
	Defendant.)	
15)	

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1 Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (the
2 Commissioner), moves, with the approval of this Court, for an extension of time to file her
3 Cross-Motion To Affirm by thirty-one days from December 18, 2015 to January 18, 2016. This
4 is the Commissioner's first request for an extension.

5 There is good cause because the Commissioner's counsel is currently experiencing a
6 heavy workload and has been out of the office unexpectedly. The Commissioner makes this
7 request in good faith and needs additional time to respond to the issues Plaintiff Betty L. Miers
8 (Plaintiff) raised in her Motion For Judgment On The Pleadings. Counsel emailed Plaintiff
9 regarding this extension, but, at the time of filing, had not yet received a response.

10 Respectfully submitted,

11 Date: December 18, 2015

DANIEL G. BOGDEN
United States Attorney
BLAINE T. WELSH
Chief, Civil Division

14 By: /s/ April A. Alongi
15 APRIL A. ALONGI
Special Assistant United States Attorney

16 Attorneys for Defendant

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20 IT IS SO ORDERED.

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23 DATE: January 6, 2016


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25 THE HONORABLE CAM FERENBACH
United States Magistrate Judge

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DEFENDANT'S CERTIFICATE OF SERVICE

I certify that I caused a copy of the Defendant's Motion For Extension Of Time To File Cross-Motion To Affirm to be served, via CM/ECF notification, on:

DANIEL S. JONES
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New York, New York 10165
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HAL TAYLOR
223 Marsh Avenue
Reno, Nevada 89505
haltaylorlawyer@gbis.com

Date: December 18, 2015

DANIEL G. BOGDEN
United States Attorney
BLAINE T. WELSH
Chief, Civil Division

By: /s/ April A. Alongi
APRIL A. ALONGI
Special Assistant United States Attorney

Attorneys for Defendant