

1 DANIEL G. BOGDEN
 United States Attorney
 District of Nevada
 Nevada Bar No. 2137
 3 MARLA K. LETELLIER
 Special Assistant United States Attorney
 4 California Bar No. 234969
 160 Spear Street, Suite 800
 5 San Francisco, CA 94105
 Tel: (415) 977-8928
 6 Fax: (415) 744-0134
 Email: Marla.Letellier@ssa.gov
 7 Attorneys for Defendant

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

10 JOHN RAY VELLA,)
 11)
 Plaintiff,)
 12)
 v.)
 13) Case No.: 2:15-cv-01560-APG-GWF
 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 November 18, 2015, by 30 days from
 22 December 21, 2015 to January 20, ~~2015~~ ²⁰¹⁶. This is Defendant's first request for an extension of time to
 23 respond to Plaintiff's Motion. Counsel for Defendant contacted Plaintiff's counsel on December 18,
 24 2015, and Plaintiff's counsel responded on December 21, 2015 that he does not oppose Defendant's
 25 motion. Defendants' current deadline is December 21, 2015.
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1 The instant request is not intended to cause delay and is necessary because counsel for
2 Defendant has been out of the office sick for more than a week, and because of the heavy workload of
3 counsel for Defendant, who is responsible for briefing dispositive motions in seven federal district
4 court cases between December 16, 2015 and January 7, 2016, as well as other agency matters.

5 It is therefore respectfully requested that Defendant be granted a thirty (30) day extension of
6 time to respond to Plaintiff's motion, up to and including January 20, ~~2015~~²⁰¹⁶.

7 Dated: December 21, 2015.

8 Respectfully submitted

9 DANIEL G. BOGDEN
10 United States Attorney

11 */s/ Marla K. Letellier*
12 MARLA K. LETELLIER
Special Assistant United States Attorney

13 OF COUNSEL:

14 DEBORAH STACHEL
15 Acting Regional Chief Counsel
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17 IT IS SO ORDERED:

18 *George Foley Jr.*
19 _____
UNITED STATES MAGISTRATE JUDGE

20 DATED: December 22, 2015
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1 **CERTIFICATE OF SERVICE**

2 I, Marla Letellier, certify that the following individual(s) were served with a copy of the
3 foregoing **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date, and via the method
4 of service, identified below:

5 **CM/ECF:**

6
7 David M. Moore, Esq.
8 Edward M. Bernstein & Associates
9 500 S. Fourth St.
10 Las Vegas, NV 89101
11 Email: dmoore@edbernstein.com

12 Dated this 21st day of December, 2015

13 */s/ Marla K. Letellier*
14 MARLA K. LETELLIER
15 Assistant United States Attorney
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