

1 RICHARD E. DONALDSON, ESQ., CHTD.
 RICHARD E. DONALDSON, ESQ.
 2 Nevada Bar No. 1095
 2300 West Sahara Ave., Suite 800
 3 Las Vegas, NV 89102
 Attorney for Plaintiff
 4

5 UNITED STATES DISTRICT COURT
 6 DISTRICT OF NEVADA

7 * * * * *

8 FRANCES E. SWARTZ)
)
 9)
 Plaintiff,)
 10)
 vs.)
 11)
 12 CAROLYN COLVIN)
 COMMISSIONER OF SOCIAL)
 13 SOCIAL SECURITY)
)
 14 Defendant.)
 15

CIVIL ACTION NO. 2:15-cv-01811-JAD-PAL

16 MOTION FOR AN EXTENSION OF TIME TO FILE A
 17 MOTION FOR REVERSAL/REMAND
 18 (First Request)

19 FRANCES E. SWARTZ by and through her counsel of record, Richard E. Donaldson,
 20 Esq. respectfully moves for a thirty-one (31) day extension of time to and including
 21 Monday, April 25, 2016 in which to file a Motion for Reversal/Remand. The briefing
 22 schedule [Doc. #14] currently requires that this motion be filed by **March 23, 2016**.
 23 Counsel became aware of a new Social Security Ruling (SSR 16-3) that may [or may not]
 24 bear on the outcome of this litigation, and requires additional time to consider what effects
 25 the new Ruling would have on any future proceedings, should there be any.

26 This request is being filed as a Motion as undersigned Counsel attempted to
 27 contact April Alongi, Esq., of the Office of General Counsel, and counsel of record for the
 28 Defendant, but she is unavailable at this time. However, attorneys at the Office of General

1 Counsel have not opposed undersigned Counsel's Motion(s) for Extension of Time in forty-
2 three years, he cannot think of any reason the OGC would start now, requests to allow
3 extensions of time have always been routinely accepted as a matter of courtesy, the
4 Defendant would not be prejudiced in any way, and on that basis believes that Ms. Alongi
5 or the Office of General Counsel would have no objection to this Motion.

6 The Federal Rules of Civil Procedure provide for an enlargement of time for cause
7 shown.

8 When an act may or must be done within a specified time, the court may, for good
9 cause, extend the time . . . if a request is made, before the original time or its
10 extension expires

11 Fed. R. Civ. P., Rule 6(b).

12 This request is made prior to the expiration of time permitted to file a Motion to
13 Reversal/Remand.

14 DATED this 22nd day of March, 2016.

15 Respectfully submitted,

16 RICHARD E. DONALDSON, ESQ., CHTD.

17 Richard E. Donaldson _____
18 Nevada Bar No. 1095
19 2300 West Sahara Ave., Suite 800
20 Las Vegas, NV 89102
Attorney for Plaintiff

21 IT IS SO ORDERED:

22 UNITED STATES MAGISTRATE JUDGE

23 Jerry A. Jeen _____
24

25 Date: March 25, 2016 _____
26