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7 Attorneys for Defendant

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

10 TERESA MORALES,)	Case No: 2:16-cv-00230-JAD-NJK
)	
Plaintiff)	
)	DEFENDANT’S MOTION FOR
v.)	EXTENSION OF TIME TO FILE CROSS-
)	MOTION TO AFFIRM OR NOTICE OF
13 CAROLYN W. COLVIN, Acting)	VOLUNTARY REMAND OF THE CASE
Commissioner of Social Security,)	
)	(Second Request)
Defendant.)	
)	

16 Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (the
 17 Commissioner), moves, with the approval of this Court, for an extension of time to file her
 18 Cross-Motion To Affirm or Notice Of Voluntary Remand Of The Case by thirty days from
 19 August 8, 2016 to September 7, 2016, with all other dates in this Court’s Order Concerning
 20 Review Of Social Security Cases extended accordingly. This is the Commissioner’s second
 21 request for an extension.

22 There is good cause because, since the prior extension, counsel has been handling a large
 23 number of District Court and Ninth Circuit cases in addition to this one, with counsel has been
 24 handling a large number of District Court and Ninth Circuit cases in addition to this one, with
 25 twelve briefs—one in the Ninth Circuit—due within the next thirty days. Additionally, the
 26

1 Commissioner's counsel has had numerous other deadlines, including a dispositive motion in an
2 employment case, a settlement memorandum, and multiple mentoring and reviewing duties in
3 the Office of the General Counsel. Counsel had a conference in an employment matter and was
4 also out of the office for five days. As result, the Commissioner needs additional time to
5 properly respond to the issues Plaintiff raised in her Motion. Counsel makes this request in good
6 faith without any intention to unnecessarily delay these proceedings. The Commissioner's
7 counsel contacted Plaintiff, but at the time of filing, had not yet heard back.

8 Respectfully submitted,

9 Date: August 8, 2016

10 DANIEL G. BOGDEN
11 United States Attorney
12 BLAINE T. WELSH
13 Chief, Civil Division

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

17 Attorneys for Defendant

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21 IT IS SO ORDERED.

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24 DATE: August 10, 2016

25 
26 THE HONORABLE NANCY J. KOPPE
United States Magistrate Judge

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DEFENDANT'S CERTIFICATE OF SERVICE

I certify that I caused a copy of Defendant's Motion For Extension Of Time To File Cross-Motion To Affirm Or Notice Of Voluntary Remand Of The Case (Second Request) to be served, via CM/ECF notice, on:

RICHARD E. DONALDSON
Esquire
gunlawyer@aol.com

Date: August 8, 2016

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