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 3 District of Nevada

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10 Attorneys for Defendant

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

14 MARCOS GARCIA,  
 15 Plaintiff,  
 16 v.  
 17 CAROLYN W. COLVIN,  
 Acting Commissioner of Social Security,  
 18 Defendant.

) Case No. 2:16-cv-01018-APG-NJK  
 )  
 ) **UNOPPOSED MOTION FOR**  
**EXTENSION OF TIME**  
**(FIRST REQUEST)**  
 )

19 \_\_\_\_\_  
 20  
 21 Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (“Defendant”),  
 22 respectfully requests that the time for Defendant to file her response to Plaintiff’s Motion for Summary  
 23 Judgment be extended from October 24, 2016 to November 23, 2016. This is Defendant’s first request  
 24 for an extension of time to respond to Plaintiff’s Motion for Summary Judgment.

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1 Defendant requests this extension due to her attorney's inordinately heavy caseload in October  
2 2016 through November 2016, including 4 other briefs and 1 post-judgment motion due between  
3 October 24, 2016 and October 31, 2016 in the United States District Court for the Northern District of  
4 California, Eastern District of California, Central District of California and District of Nevada.  
5 Defendant's counsel respectfully requests this additional time to review the Administrative Record, and  
6 to evaluate and respond to Plaintiff's arguments.

7 This request is made in good faith with no intention to unduly delay the proceedings.

8 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this motion,  
9 on October 21, 2016.

10 Respectfully submitted October 21, 2016.

11 DANIEL G. BOGDEN  
12 United States Attorney

13 /s/ Timothy R. Bolin  
14 TIMOTHY R. BOLIN  
15 Special Assistant United States Attorney

16 OF COUNSEL:

17 DEBORAH LEE STACHEL  
18 Regional Chief Counsel, Region IX

19 BEATRICE NA  
20 Assistant Regional Counsel

21 IT IS SO ORDERED:

22   
23 \_\_\_\_\_  
24 UNITED STATES MAGISTRATE JUDGE

25 DATED: October 24, 2016  
26 \_\_\_\_\_