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 District of Nevada

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7 Attorneys for Defendant

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

13 DAVE E. CHAPPELL)	
14 Plaintiff,)	Case No. 2:16-cv-01940-APG-VCF
)	
15 v.)	
)	UNOPPOSED MOTION FOR
16 CAROLYN W. COLVIN,)	EXTENSION OF TIME
Acting Commissioner of Social Security,)	(FIRST REQUEST)
)	
17 Defendant.)	
)	
18)	

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20 Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (“Defendant”)
 21 respectfully requests that the Court extend the time for Defendant to file her Cross-Motion to Affirm, due
 22 on December 19, 2016 by 30 days, through and including January 18, 2016.

23 An extension of time is needed in order to prepare Defendant’s Cross-Motion to Affirm because
 24 the undersigned attorney has only recently been cleared as a Special Assistant United States Attorney, and
 25 supervisory attorneys must review the Commissioner’s brief prior to filing. The undersigned currently
 26 has 25 pending District Court and Circuit Court cases that are in various stages of litigation, handles

1 employment and privacy matters for the agency, and is scheduled to be on vacation from December 19,
2 2016 through December 27, 2016. Counsel assigned to review the Commissioner's brief currently has 45
3 District and Circuit Court cases that are in various stages of litigation, three of which require imminent
4 briefing, and additionally handles bankruptcy and other litigation matters for the agency. This request is
5 made in good faith with no intention to unduly delay the proceedings.

6 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this motion,
7 on December 7, 2016.

8 Respectfully submitted this 9th day of December, 2016.

9 DANIEL G. BOGDEN
10 United States Attorney

11 /s/ C. Hay-Mie Cho
12 C. HAY-MIE CHO
13 Special Assistant United States Attorney

14 OF COUNSEL:

15 DEBORAH LEE STACHEL
16 Regional Chief Counsel, Region IX

17
18 IT IS SO ORDERED:

19 
20 _____
21 UNITED STATES MAGISTRATE JUDGE

22 DATED: 1-10-2017
23
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1 **CERTIFICATE OF SERVICE**

2 I, **C. Hay-Mie Cho**, certify that the following individuals were served with a copy of the
3 **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date and via the method of service
4 identified below:

5 **CM/ECF:**

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16 Dated this 9th day of December, 2016.

17 /s/ C. Hay-Mie Cho
18 **C. HAY-MIE CHO**
19 Special Assistant United States Attorney
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