

1 DANIEL G. BOGDEN, NSBN 2137
 United States Attorney
 2 BLAINE T. WELSH
 Chief, Civil Division
 3 APRIL A. ALONGI, VSBN 76459
 Special Assistant United States Attorney
 4 160 Spear Street, Suite 800
 San Francisco, California 94105
 5 Phone: 415-977-8954
 Fax: 415-744-0134
 6 april.alongi@ssa.gov

7 Attorneys for Defendant

8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10	GERALD D. MCKENZIE,)	Case No: 2:16-cv-01974-APG-GWF
11	Plaintiff)	
12	v.)	DEFENDANT’S MOTION FOR
13	CAROLYN W. COLVIN, Acting)	EXTENSION OF TIME TO ANSWER
14	Commissioner of Social Security,)	PLAINTIFF’S COMPLAINT
15	Defendant.)	

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17 Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (the
 18 Commissioner), moves for an extension of time to answer Plaintiff Gerald D. McKenzie’s
 19 (Plaintiff) Complaint by thirty days from November 7, 2016 to December 7, 2016, with all other
 20 dates extended accordingly. This is the Commissioner’s first request for an extension.

21 There is good cause because the Certified Administrative Record (CAR) is defective. The
 22 component of the Social Security Administration responsible for production of the CAR, the
 23 Office of Disability Adjudication and Review (ODAR) continues to work through a substantial
 24 caseload, and has not yet provided the corrected CAR in the above-captioned case. Counsel for

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the Commissioner has contacted ODAR and is working to produce the CAR. The Commissioner contacted Plaintiff's counsel via phone regarding this motion, but counsel was unavailable.

Respectfully submitted,

Date: November 7, 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

IT IS SO ORDERED.

DATE: November 8, 2016


THE HONORABLE GEORGE FOLEY, JR.
United States Magistrate Judge

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DEFENDANT'S CERTIFICATE OF SERVICE

I certify that I caused Defendant's Motion For Extension Of Time To Answer Plaintiff's Complaint, via CM/ECF notice, on:

MARK D. BARRETT
Esquire
mark@mydisabilityattorney.com

Date: November 7, 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