

1 DANIEL G. BOGDEN
United States Attorney
2 District of Nevada

3 JENNIFER A. KENNEY, SBN CA 241625
Special Assistant United States Attorney
4 160 Spear Street, Suite 800
5 San Francisco, California 94105
Telephone: (415) 977-8945
6 Facsimile: (415) 744-0134
E-Mail: jennifer.a.kenney@ssa.gov

7 Attorneys for Defendant
8
9

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

12 VENONA RICHION,)
13 Plaintiff,)
14 v.)
15 NANCY A. BERRYHILL¹,)
Acting Commissioner of Social Security,)
16 Defendant.)
17

Case No. 2:16-CV-02243-GMN-VCF

**UNOPPOSED MOTION FOR
EXTENSION OF TIME
(FIRST REQUEST)**

18
19 Defendant Nancy A. Berryhill, Acting Commissioner of Social Security (“Defendant”),
20 respectfully requests that the Court extend the time for Defendant to file her Cross-Motion to Affirm,
21 due on February 22, 2017, by 30 days, through and including March 24, 2017.
22
23
24

25 ¹ Nancy A. Berryhill is now the Acting Commissioner of Social Security. Pursuant to Rule 25(d) of the
Federal Rules of Civil Procedure, Nancy A. Berryhill should be substituted for Acting Commissioner
26 Carolyn W. Colvin as the defendant in this suit. No further action needs to be taken to continue this suit
by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 An extension of time is needed because Defendant's counsel has been out of the office
2 unexpectedly to care for a family member with a medical issue. This request is made in good faith with
3 no intention to unduly delay the proceedings.

4 Counsel for Defendant conferred with Plaintiff's counsel February 20, 2017, who has no
5 opposition to this motion.

6 Respectfully submitted this 20th day of February 2017.

7 DANIEL G. BOGDEN
8 United States Attorney

9 /s/ Jennifer A. Kenney
10 JENNIFER A. KENNEY
11 Special Assistant United States Attorney

12 OF COUNSEL:

13 DEBORAH LEE STACHEL
14 Regional Chief Counsel, Region IX

15 IT IS SO ORDERED:

16 
17 _____
18 UNITED STATES MAGISTRATE JUDGE

19 DATED: 2-21-2017

1 **CERTIFICATE OF SERVICE**

2 I, **JENNIFER A. KENNEY**, certify that the following individual was 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:**

6 **CYRUS SAFA**
7 Law Offices of Lawrence D. Rohlring
8 12631 East Imperial Highway, Suite C-115
9 Santa Fe Springs, CA 90670

10 **GERALD M. WELT**
11 732 Sixth Street, Suite 200-D
12 Las Vegas, NV 89101

13 Dated this 20th day of February 2017.

14 /s/ Jennifer A. Kenney
15 **JENNIFER A. KENNEY**
16 Special Assistant United States Attorney
17
18
19
20
21
22
23
24
25
26