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 District of Nevada

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7 Attorneys for Defendant

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

13 GAIL ALBANESE,)	Case No. 2:16-cv-02350-JAD-VCF
14 Plaintiff,)	
15 v.)	AMENDED UNOPPOSED MOTION FOR
16 NANCY A. BERRYHILL,)	EXTENSION OF TIME
Acting Commissioner of Social Security,)	(FIRST REQUEST)
17 Defendant.)	
)	

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 RESPONSE TO
 21 PLAINTIFF’S COUNSEL’S MOTION FOR ATTORNEY FEES PURSUANT TO 42 U.S.C. § 406(b).
 22 Defendant’s response is presently due on September 20, 2018 (CR 34), and Defendant seeks to extend
 23 the due date by fourteen (14) days to October 4, 2018. An extension of time is needed because
 24 Defendant’s counsel needs additional time to consult with the Defendant agency in order to verify and
 25 document the amounts awarded to Plaintiff resulting from Court ordered remand, and to verify and
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1 document the amounts withheld by the Defednant agency for purposes of payment of 406(b) fees. This
2 is Defendant's first request for an extension. The motion is made in good faith with no intention to
3 unduly delay the proceedings.

4 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this motion,
5 on September 19, 2018.

6 Respectfully submitted this 19th day of September 2018.

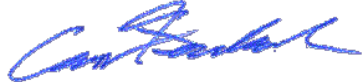
7 DAYLE ELIESON
8 United States Attorney

9 /s/ Ben A. Porter
10 BEN A. PORTER
11 Special Assistant United States Attorney

12 OF COUNSEL:

13 DEBORAH LEE STACHEL
14 Regional Chief Counsel, Region IX

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17 IT IS SO ORDERED:

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19 CAM FERENBACH
20 UNITED STATES MAGISTRATE JUDGE

21 DATED: 9-19-2018
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1 **CERTIFICATE OF SERVICE**

2 I, Ben A. Porter, 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 JOSEPHINE M. GERRARD (CBN 313221)
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8 1791 Solano Avenue, Suite F01
9 Berkeley, California 94707
10 Tel (510) 838-0529
11 Fax (510) 280-1635
12 Email: jo@gerrardlawoffices.com

13 Dated this 19th day of September 2018.

14 /s/ Ben A. Porter
15 BEN A. PORTER
16 Special Assistant United States Attorney
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