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2 District of Nevada

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**UNITED STATES DISTRICT COURT**  
**DISTRICT OF NEVADA**

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11 DESIREE NELSON,

12 Plaintiff,

13 v.

14 NANCY A. BERRYHILL,  
Acting Commissioner of Social Security,

15 Defendant.

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) Case No.: 2:16-cv-02402-JCM-CWH

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

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18 Defendant Nancy A. Berryhill, Acting Commissioner of Social Security (“Defendant”)  
19 respectfully requests that the Court extend the time for Defendant to file her Opposition to Plaintiff’s  
20 Motion for Remand, due on November 13, 2017, by 30 days, through and including December 13, 2017.

21 An extension of time is needed in order to prepare Defendant’s Opposition because the  
22 undersigned counsel is involved in preparations for two evidentiary hearings in labor and employment  
23 litigation matters, and requires additional time to adequately research and prepare the issues presented  
24 by Plaintiff in motion to remand. This request is made in good faith with no intention to unduly delay  
25 the proceedings.

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1 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this motion,  
2 on November 7, 2017.

3 Respectfully submitted this 7th day of November 2017.

4 STEVEN W. MYHRE  
5 Acting United States Attorney

6 /s/ Cynthia B. De Nardi  
7 CYNTHIA B. DE NARDI  
8 Special Assistant United States Attorney

9 OF COUNSEL:

10 DEBORAH LEE STACHEL  
11 Regional Chief Counsel, Region IX

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13 IT IS SO ORDERED:

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16 UNITED STATES MAGISTRATE JUDGE

17 DATED: November 8, 2017

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**CERTIFICATE OF SERVICE**

I, Cynthia B. De Nardi, certify that the following individual was served with a copy of the **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date and via the method of service identified below:

**CM/ECF:**

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Dated this 7th day of November 2017.

*/s/ Cynthia B. De Nardi*  
\_\_\_\_\_  
CYNTHIA B. DE NARDI  
Special Assistant United States Attorney