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8

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 DESIREE NELSON,)
12 Plaintiff,) Case No.: 2:16-cv-02402-JCM-CWH
13 v.)
14 NANCY A. BERRYHILL,)
15 Acting Commissioner of Social Security,)
16 Defendant.)
17

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

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.

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

12 IT IS SO ORDERED:

13 
14 _____
15 UNITED STATES MAGISTRATE JUDGE

16 DATED: November 8, 2017

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:

Mark D. Barrett
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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