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 District of Nevada

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7 Attorneys for Defendant

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

13 JASON S. CASTLE,	)	
14 Plaintiff,	)	Case No. 2:16-cv-02412-GMN-GWF
	)	
15 v.	)	
	)	<b>UNOPPOSED MOTION FOR</b>
16 CAROLYN W. COLVIN,	)	<b>EXTENSION OF TIME</b>
Acting Commissioner of Social Security,	)	<b>(FIRST REQUEST)</b>
17 Defendant.	)	
18	)	

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20 Defendant Carolyn W. Colvin, Acting Commissioner of Social Security (“Defendant”)  
 21 respectfully requests that the Court extend the time for Defendant to file her Answer, due on January 3,  
 22 2017 by 30 days, through and including February 2, 2017.

23 Defendant needs additional time to draft and file her answer because the United States Attorney’s  
 24 Office has not yet received the Certified Administrative Record (CAR). Therefore, Defendant is unable  
 25 to file the CAR with her Answer. Defendant contacted Plaintiff’s counsel, Marc A. Kalagian, by telephone  
 26 on January 3, 2017, but was unable to reach Plaintiff’s counsel, Gerald Welt. Mr. Kalagian informed

1 Defendant that he would authorize Defendant's request on Mr. Welt's behalf. This request is made in  
2 good faith with no intention to unduly delay the proceedings.

3 Respectfully submitted this 3rd day of January, 2017.

4 DANIEL G. BOGDEN  
5 United States Attorney

6 /s/ C. Hay-Mie Cho  
7 C. HAY-MIE CHO  
8 Special Assistant United States Attorney

9 OF COUNSEL:

10 DEBORAH LEE STACHEL  
11 Regional Chief Counsel, Region IX

12  
13 IT IS SO ORDERED:

14   
15 UNITED STATES MAGISTRATE JUDGE

16 DATED: January 4, 2017

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**CERTIFICATE OF SERVICE**

I, **C. Hay-Mie Cho**, certify that the following individuals were 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:**

Marc V. Kalagian  
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Dated this 3rd day of January, 2017.

/s/ C. Hay-Mie Cho  
**C. HAY-MIE CHO**  
Special Assistant United States Attorney