

Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

TANIA V. REAL DE RAGAN,)	Case No: 2:16-cv-02468-JAD-PAL
)	
Plaintiff)	
)	
v.)	DEFENDANT’S MOTION FOR
)	EXTENSION OF TIME TO FILE CROSS-
)	MOTION TO AFFIRM
NANCY A. BERRYHILL, Acting)	
Commissioner of Social Security, ¹)	(Second Request)
)	
Defendant.)	

Defendant Nancy A. Berryhill, Acting Commissioner of Social Security (the Commissioner), moves for an extension of time for the Commissioner to file her Cross-Motion To Affirm by thirty days from June 5, 2017 to July 5, 2017, with all other dates in this Court's Scheduling Order extended accordingly. This is the Commissioner's second request for an extension.

There is good cause because, since the Commissioner's previous extension, counsel has had numerous other deadlines, including District Court briefs, a dispositive motion in an

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

1 employment law case, and an oral argument in a District Court case. Counsel was also out of the
2 office on approved leave for nearly two weeks in May and, as of June 5, 2017, will be out of the
3 office on extended leave. This case will be transferred to another attorney in the office. As a
4 result, the Commissioner needs additional time to properly respond to the issues Plaintiff Tania V.
5 Real De Ragan (Plaintiff) raised in her Motion For Reversal And/Or Remand. Counsel makes this
6 request in good faith and without any intention of undue delay. At the time of filing, counsel had
7 not yet received a response from Plaintiff as to this request.

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9 Respectfully submitted,

10 Date: June 2, 2017


STEVEN W. MYHRE
Acting United States Attorney
BLAINE T. WELSH
Chief, Civil Division

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13 By: /s/ April A. Alongi
APRIL A. ALONGI
14 Special Assistant United States Attorney

15 Attorneys for Defendant

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18 IT IS SO ORDERED.

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21 DATE: June 12, 2017


22 THE HONORABLE PEGGY A. LEEN
23 United States Magistrate Judge
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DEFENDANT'S CERTIFICATE OF SERVICE

I certify that I caused Defendant's Motion For Extension Of Time To File Cross-Motion To Affirm
(Second Request) to be served, via CM/ECF notice, on:

MARC V. KALAGIAN
Attorney at Law
rohlfig.kalagian@rksslaw.com

Date: June 2, 2017

STEVEN W. MYHRE
Acting United States Attorney
BLAINE T. WELSH
Chief, Civil Division

By: /s/ April A. Alongi
APRIL A. ALONGI
Special Assistant United States Attorney

Attorneys for Defendant