

STEVEN W. MYHRE, NVBN 9635
United States Attorney
District of Nevada

RICHARD M. RODRIGUEZ
Special Assistant United States Attorney
160 Spear Street, Suite 800
Telephone No. (415) 977-8926
Facsimile No. (415) 977-0134
Email Address: richard.rodriguez@ssa.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ROBYN ANN WILLIAMS,

Plaintiff,

v.

NANCY A. BERRYHILL,
Acting Commissioner of Social Security,

Defendant.

Case No. 2:17-CV-01036-JAD-VCF

**UNOPPOSED MOTION FOR
EXTENSION OF TIME AND PROPOSED
ORDER
(FIRST REQUEST)**

Defendant Nancy A. Berryhill, Acting Commissioner of Social Security ("Defendant") respectfully requests that the Court extend the time for Defendant to file her response to Plaintiff's motion for summary judgment and cross motion for summary judgment, due on August 17, 2017, by 32 days, through and including September 18, 2017.

An extension of time is needed in order to prepare Defendant's response and cross motion because the undersigned's elderly mother has had a medical emergency and has been hospitalized today, which may require travel to Florida to provide assistance to his father who suffers from Parkinsonian Syndrome. This request is made in good faith with no intention to unduly delay the proceedings.

1 Counsel for Defendant conferred with Plaintiff's counsel, Cyrus Safa by email on August 14,
2 2017, who has no opposition to this motion.

3 Respectfully submitted this 14th day of August 2017.
4

5 STEVEN W. MYHRE, NVBN 9635
6 United States Attorney

7 /s/ Richard M. Rodriguez
8 RICHARD M. RODRIGUEZ
9 Special Assistant United States Attorney
10
11

12 IT IS SO ORDERED:

13 
14 _____
15 UNITED STATES MAGISTRATE JUDGE

16 DATED: 8-14-2017
17 _____
18
19
20
21
22
23
24
25
26

1 **CERTIFICATE OF SERVICE**

2 I, **Richard M. Rodriguez**, 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
identified below:

4 **CM/ECF:**

5 Cyrus Safa, Esq.
6 Law Offices Lawrence D. Rohlfsing
7 12631 East Imperial Highway, Suite C-115
8 Santa Fe Springs, CA 90670
9 Cyrus.safa@rohlfsinglaw.com

10 Gerald M. Welt, Esq.
11 732 S. Sixth Street, Suite 200-D
12 Las Vegas, NV 89101
13 gmwesq@weltlaw.com

14 Dated this 14th day of August, 2017

15 */s/ Richard M. Rodriguez*
16 RICHARD M. RODRIGUEZ
17 Special Assistant United States Attorney
18
19
20
21
22
23
24
25
26