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10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 JACQUELYNN BORTOLAMEDI,)
13 Plaintiff,)
14 v.)
15 NANCY A. BERRYHILL,)
Acting Commissioner of Social Security,)
16 Defendant.)
17

Case No. 2:17-cv-01473-JAD-PAL

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

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19 Defendant Nancy A. Berryhill, Acting Commissioner of Social Security (“Defendant”)
20 respectfully requests that the Court extend the time for Defendant to file her Cross-Motion to Affirm in
21 response to Plaintiff’s Motion for Judgment (Dkt. No. 13) due on November 13, 2017, by 45 days,
22 through and including December 28, 2017. Defendant further requests that all subsequent deadlines set
23 forth in the Court’s Order Concerning Review of Social Security Cases (Dkt. No. 10) shall be extended
24 accordingly.

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1 Defendant requests this extension because of her attorney's heavy workload for the months of
2 November and December 2017. This request is made in good faith with no intention to unduly delay the
3 proceedings.

4 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this motion,
5 on November 13, 2017.

6 Respectfully submitted, November 13, 2017.

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8 STEVEN W. MYHRE
Acting United States Attorney

9 */s/ Beatrice Na*
10 BEATRICE NA
Special Assistant United States Attorney

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12 IT IS SO ORDERED:

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14 _____
UNITED STATES MAGISTRATE JUDGE

15 DATED: November 20, 2017
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1 **CERTIFICATE OF SERVICE**

2 I, **BEATRICE NA**, 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
4 identified below:

5 **CM/ECF:**

6 Daniel S. Jones
7 Law Offices of Charles E. Binder and Harry J. Binder, LLP
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9 New York, NY 10022
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13 223 Marsh Avenue
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18 Dated: November 13, 2017

19 /s/ Beatrice Na
20 BEATRICE NA
21 Special Assistant United States Attorney
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