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

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

Case No. 2:17-cv-01686-APG-NJK

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

18
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 Response to Plaintiff’s
21 Motion for Reversal and/or Remand, due on January 12, 2018, by 30 days, through and including
22 February 11, 2018.

23 This first request for extension is needed due to Defendant’s counsel’s exceptionally heavy
24 workload at this time, including two employment law matters in active litigation before the Equal
25 Employment Opportunity Commission as well as a Ninth Circuit Court Appellate brief due next week
26 and several district court filings this month. The additional time will enable Defendant to adequately

1 research the issues Plaintiff has presented. This request is made in good faith with no intention to
2 unduly delay the proceedings.

3 Counsel for Defendant conferred with Plaintiff's counsel on January 8, 2018. Plaintiff does not
4 oppose this motion.

5 Respectfully submitted this 8th day of January 2018.

6 STEVEN W. MYHRE
7 United States Attorney

8 /s/ Jennifer A. Kenney
9 JENNIFER A. KENNEY
Special Assistant United States Attorney

10 OF COUNSEL:

11 DEBORAH LEE STACHEL
12 Regional Chief Counsel, Region IX

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14 IT IS SO ORDERED:

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17 UNITED STATES MAGISTRATE JUDGE

18 DATED: January 9, 2018