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2 District of Nevada

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7 Attorneys for Defendant

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

12 JEANNIE DUTRAFEREA, )

13 Plaintiff, )

14 v. )

15 NANCY A. BERRYHILL, )  
16 Acting Commissioner of Social Security, )

17 Defendant. )  
18

) Case No. ~~2:13-cv~~2:17-cv-01729-RFB-PAL

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

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 and  
21 Opposition to Plaintiff’s Motion for Reversal, due on February 15, 2018, by 30 days, through and  
22 including March 17, 2018.

23 An extension of time is needed because Defendant’s counsel has had a high workload volume in  
24 the month of February and needs additional time to prepare Defendant’s opposition brief in this case.  
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1 This is Defendant's first request for an extension. The motion is made in good faith with no intention to  
2 unduly delay the proceedings.

3 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this motion,  
4 on February 13, 2018.

5 Respectfully submitted this 13<sup>th</sup> day of February 2018.

6 DAYLE ELIESON  
7 United States Attorney

8 /s/ Ben A. Porter  
9 BEN A. PORTER  
Special Assistant United States Attorney

10 OF COUNSEL:  
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12 DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX  
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16 IT IS SO ORDERED:

17   
18 UNITED STATES MAGISTRATE JUDGE

19 DATED: February 15, 2018  
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1 **CERTIFICATE OF SERVICE**

2 I, Ben A. Porter, 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 HEATHER FREEMAN  
7 Attorney for Plaintiff  
8 IL Bar No. 6282430 / FL Bar No. 40561  
9 Law Office of Heather Freeman, PLLC  
10 P.O. Box 13962  
11 Tallahassee, FL 32308  
12 (850) 391-5336 / (800) 882-4212 fax  
13 hf@hfreemanlaw.com

14 Dated this 13<sup>th</sup> day of January 2014.

15 */s/ Ben A. Porter*  
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17 BEN A. PORTER  
18 Special Assistant United States Attorney  
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