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

12 PATRICIA J. SHANNON,)
13 Plaintiff,) Case No. 2:17-cv-1941-JAD-VCF
14)
v.)
15) **UNOPPOSED MOTION FOR**
NANCY A. BERRYHILL,) **EXTENSION OF TIME**
16 Acting Commissioner of Social Security,) **(FIRST REQUEST)**
17 Defendant.)
18 _____)

19 Defendant Nancy A. Berryhill, Acting Commissioner of Social Security (“Defendant”)
20 respectfully requests that the Court extend the time for Defendant to respond to Plaintiff’s Complaint,
21 due on **December 26, 2017**, by **45 days**, through and including **February 9, 2018**. This request is made
22 in good faith with no intention to unduly delay the proceedings.

23 An extension of time is needed because the parties are currently trying to resolve the threshold
24 question of whether this Court has jurisdiction over Plaintiff’s Complaint. The parties are also relatedly
25 investigating the status of any pending requests for administrative review of the administrative law
26

1 judge's decision underlying Plaintiff's Complaint. The additional time sought in the instant motion
2 should allow the parties to resolve the above issues after accounting for anticipated delays caused by the
3 upcoming holidays.

4 Counsel for Defendant conferred with Plaintiff's counsel, Richard E. Donaldson, by telephone
5 on December 19, 2017. During this telephonic conversation, Plaintiff's counsel expressed his consent to
6 this motion.

7 Respectfully submitted this 19th day of December 2017.

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9 STEVEN W. MYHRE
Acting United States Attorney

10 /s/ Asim H. Modi
11 ASIM H. MODI
Special Assistant United States Attorney

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13 OF COUNSEL:

14 DEBORAH LEE STACHEL
15 Regional Chief Counsel, Region IX

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18 IT IS SO ORDERED:

19 
20 _____
UNITED STATES MAGISTRATE JUDGE

21 DATED: 12-21-2017
22 _____

1 **CERTIFICATE OF SERVICE**

2 I, Asim H. Modi, certify that the following individuals were served with the foregoing
3 **UNOPPOSED MOTION FOR EXTENSION (FIRST REQUEST)** on the date and via the method of
4 service identified below:

5 **CM/ECF:**

6 Richard E. Donaldson, Esq.
7 Richard E. Donaldson, Esq., Chtd.
8 2300 West Sahara Avenue, Suite 800
9 Las Vegas, Nevada 89102
10 gunlawyer@aol.com

11 Dated this 19th day of December 2017.

12 //s// Asim H, Modi
13 ASIM H. MODI
14 Special Assistant United States Attorney
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