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8 **UNITED STATES DISTRICT COURT**  
9 **DISTRICT OF NEVADA**

11 TANYA L. ISAHAROV, )  
12 Plaintiff, )  
13 v. )  
14 NANCY A. BERRYHILL, )  
Acting Commissioner of Social Security, )  
15 Defendant. )  
16 )  
17 )

Case No.: 2:17-cv-01958-APG-GWF

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

18 Defendant Nancy A. Berryhill, Acting Commissioner of Social Security (Defendant)  
19 respectfully requests that the Court extend the time for Defendant to file her Cross-Motion to Affirm  
20 in response to Plaintiff’s Motion for Remand (Dkt. No. 15, filed on November 22, 2017), currently due  
21 on December 22, 2017, by 31 days, through and including Monday, January 22, 2018. Defendant  
22 further requests that all subsequent deadlines set forth in the Court’s Order Concerning Review of  
23 Social Security Cases (Dkt. No. 13) be extended accordingly.

24 This is Defendant’s first request for an extension of time to respond to Plaintiff’s Motion for  
25 Remand. Defendant requests this extension because of the workload of Defendant’s attorney assigned  
26 to this case and to allow sufficient time to adequately research and prepare the issues presented by

1 Plaintiff in her motion. This request is made in good faith and with no intention to unduly delay the  
2 proceedings.

3 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this  
4 motion, on December 18, 2017.

5 It is therefore respectfully requested that Defendant be granted an extension of time to respond  
6 to Plaintiff's Motion for Remand, through and including January 22, 2018.

7  
8 Dated: December 18, 2017

Respectfully submitted,

9 STEVEN W. MYHRE  
Acting United States Attorney

10  
11 */s/ Shea Lita Bond*  
SHEA LITA BOND  
Special Assistant United States Attorney  
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13 OF COUNSEL:

14 ALLISON J. CHEUNG  
Assistant Regional Counsel, Region IX  
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17 IT IS SO ORDERED:

18   
19 \_\_\_\_\_  
UNITED STATES MAGISTRATE JUDGE

20 DATED: 12/19/2017  
21  
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23  
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