

1 DAYLE ELIESON  
Acting United States Attorney  
2 District of Nevada

3 SHEA LITA BOND, SBN D.C. 469103  
Special Assistant United States Attorney  
4 160 Spear Street, Suite 800  
San Francisco, CA 94105  
5 Tel: (415) 977-8934  
6 Fax: (415) 744-0134  
Email: Shea.Bond@ssa.gov

7 Attorneys for Defendant

8  
9 **UNITED STATES DISTRICT COURT**  
10 **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**  
) **(SECOND 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), currently due on January 22, 2018, by 30  
21 days, through and including Wednesday, February 21, 2018. Defendant further requests that all  
22 subsequent deadlines set forth in the Court’s Order Concerning Review of Social Security Cases (Dkt.  
23 No. 13) be extended accordingly.

24 This is Defendant’s second 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 January 16, 2018.

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 February 21, 2018.

7  
8 Dated: January 17, 2018

Respectfully submitted,

9 DAYLE ELIESON  
Acting United States Attorney

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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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16  
17 IT IS SO ORDERED:

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

20 DATED: 01/18/2018  
21 \_\_\_\_\_