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

12 JACQUELINE A. MARZAN,
13 Plaintiff,

14 v.

15 NANCY A. BERRYHILL, Deputy
16 Commissioner for Operations,
performing the duties and functions
17 not reserved to the
Commissioner of Social Security,
18 Defendant.

)
) Case No. 2:17-cv-02740-GWF
)
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**UNOPPOSED MOTION
OF DEFENDANT
FOR EXTENSION OF TIME
(FIRST REQUEST)**

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21 Defendant Nancy A. Berryhill, Deputy Commissioner for Operations, performing the duties and
22 functions not reserved to the Commissioner of Social Security (“Defendant”) respectfully requests that
23 the Court extend the time for Defendant to file her Cross Motion to Affirm the Commissioner’s Decision
24 and Response to Plaintiff’s Motion for Reversal, due on April 16, 2018, by 30 days, making the Cross
25 Motion due May 16, 2018, with all other deadlines extended accordingly.
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1 This extension is being sought because counsel for Defendant is a new hire, who recently had a
2 family emergency taking her out of the office, and she needs more time to draft the brief and go through
3 the necessary in-house reviews. This request is made in good faith with no intention to unduly delay the
4 proceedings.

5 Counsel for Defendant conferred with Plaintiff's counsel, who has no opposition to this motion,
6 on April 12, 2018.

7 Respectfully submitted this 12th day of April 2018.

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9 STEVEN W. MYHRE
Acting United States Attorney

10 /s/ Elizabeth Firer
11 ELIZABETH FIRER
Special Assistant United States Attorney

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13 OF COUNSEL:

14 S. WYETH MCADAM
15 Assistant Regional Counsel
Social Security Administration

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18 IT IS SO ORDERED:

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20 UNITED STATES MAGISTRATE JUDGE

21 DATED: 4/13/2018