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2 District of Nevada

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

12 JAMES STEVEN RUIZ,)
13 Plaintiff,)
14 v.)
15 NANCY A. BERRYHILL,)
Acting Commissioner of Social Security,)
16 Defendant.)
17

Case No. 2:17-cv-03036-JAD-VCF

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

18
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 Response to Plaintiff’s
21 Motion for Remand/Reversal, due on June 20, 2018, by 30 days, through and including July 20, 2018.

22 Defendant’s counsel was recently reassigned to this case and needs the additional time requested
23 to adequately research the issues Plaintiff has presented. This request is made in good faith with no
24 intention to unduly delay the proceedings.

25 Counsel for Defendant conferred with Plaintiff’s counsel, who has no opposition to this motion,
26 on June 18, 2018.

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Respectfully submitted this 18th day of June 2018.

DAYLE ELIESON
United States Attorney

/s/ Jennifer A. Kenney
JENNIFER A. KENNEY
Special Assistant United States Attorney

OF COUNSEL:

DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX

IT IS SO ORDERED:



UNITED STATES MAGISTRATE JUDGE

DATED: 6-28-2018

CERTIFICATE OF SERVICE

I, **JENNIFER A. KENNEY**, certify that the following individual was served with a copy of the **UNOPPOSED MOTION FOR EXTENSION OF TIME** on the date and via the method of service identified below:

CM/ECF:

Marc V. Kalagian
Law Offices of Rohlfing & Kalagian, LLP
211 East Ocean Boulevard, Suite 420
Long Beach, CA 90802

Leonard Stone
Shook & Stone, Chtd.
710 South 4th Street
Las Vegas, NV 89101

Dated this 21st day of December 2015.

/s/ Jennifer A. Kenney
JENNIFER A. KENNEY
Special Assistant United States Attorney

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