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2 District of Nevada

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7 Attorneys for Defendant

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

12 PAMELA MARIE CAGLIARI,)
13 Plaintiff,)
14 v.)
15 NANCY A. BERRYHILL,)
Acting Commissioner of Social Security,)
16 Defendant.)
17)
18)

Case No. 2:18-cv-00130-GMN-CWH
**DEFENDANT’S UNOPPOSED MOTION FOR
EXTENSION OF TIME (SECOND REQUEST)**

19 Defendant Nancy A. Berryhill, Acting Commissioner of Social Security (Defendant),
20 respectfully requests a 45-day extension of time, from August 5, 2018 to October 20, 2018, for
21 Defendant to respond to Plaintiff’s Motion for Reversal and/or Remand in this case.

22 This is Defendant’s second request for an extension of time. Defendant’s first extension was in
23 connection with submitting the certified administrative record. Defendant respectfully submits that
24 good cause exists for a second extension because Defendant’s counsel was out of the office
25 unexpectedly and requires additional time to complete her review and analysis of the record and the
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1 issues raised in Plaintiff's motion and to prepare Defendant's response. Defendant's counsel also has
2 a number of other briefs due and is trying diligently to manage competing workload demands. This
3 request is made in good faith with no intention to unduly delay the proceedings. Plaintiff's counsel
4 indicated in an email dated August 31, 2018 that he does not oppose this request for an extension.
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6 Respectfully submitted,

7 Dated: August 31, 2018

DAYLE ELIESON
United States Attorney

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9 By: /s/ Margaret Branick-Abilla
10 MARGARET BRANICK-ABILLA
Special Assistant United States Attorney
Attorneys for Defendant

11 OF COUNSEL TO DEFENDANT:

12 DEBORAH LEE STACHEL
13 Regional Chief Counsel, Region IX
Social Security Administration
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15 IT IS SO ORDERED:

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18 _____
HON. CARL W. HOFFMAN
UNITED STATES MAGISTRATE JUDGE

19
20 DATED: September 5, 2018
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1 **CERTIFICATE OF SERVICE**

2 I, Margaret Branick-Abilla, certify that the following individual(s) was served with a copy of
3 the **DEFENDANT’S UNOPPOSED MOTION FOR EXTENSION OF TIME (SECOND**
4 **REQUEST)** on the date and via the method of service identified below:

5 **CM/ECF:**

6 Cyrus Safa
7 Email: cyrus.safa@rohlflinglaw.com
8 Attorney for Plaintiff

9 Gerald Welt
10 Email: gmwesq@weltlaw.com
11 Attorney for Plaintiff

12 Date: August 31, 2018

13 /s/ Margaret Branick-Abilla
14 MARGARET BRANICK-ABILLA
15 Special Assistant United States Attorney
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