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United States Attorney  
2 District of Nevada

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7 Attorneys for Defendant

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**UNITED STATES DISTRICT COURT**

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**DISTRICT OF NEVADA**

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PAMELA MARIE CAGLIARI, )  
12 )  
Plaintiff, )

Case No. 2:18-cv-00130-GMN-CWH

13

v.

**DEFENDANT'S UNOPPOSED MOTION FOR  
EXTENSION OF TIME (FIRST REQUEST)**

14

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

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Defendant. )

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1 Defendant Nancy A. Berryhill, Deputy Commissioner for Operations, performing the duties  
2 and functions not reserved to the Commissioner of Social Security (Defendant), respectfully requests a  
3 30-day extension of time, from April 17, 2018 to May 17, 2018, for Defendant to answer the  
4 complaint and submit the certified administrative record (CAR) in the above-captioned case.

5 This is Defendant's first request for an extension of time. Defendant respectfully submits that  
6 the requested extension is necessary to allow the Commissioner to prepare the CAR for submission to  
7 this Court and parties in this action. It has taken longer than anticipated to prepare the CAR despite  
8 the Commissioner's diligent efforts to have it ready in time. This request is made in good faith with  
9 no intention to unduly delay the proceedings.

10 On April 12, 2018, Plaintiff's counsel indicated via email that Plaintiff does not oppose this  
11 motion or the requested extension.

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13  
14 Dated: April 12, 2018

Respectfully submitted,

DAYLE ELIESON  
United States Attorney

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

17 OF COUNSEL TO DEFENDANT:

18 DEBORAH LEE STACHEL  
19 Regional Chief Counsel, Region IX  
Social Security Administration

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21 IT IS SO ORDERED:

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24 \_\_\_\_\_  
HON. CARL W. HOFFMAN  
UNITED STATES MAGISTRATE JUDGE

25  
26 DATED: April 13, 2018

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 (FIRST**  
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: April 12, 2018

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