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1	DAYLE ELIESON United States Attorney			
2	District of Nevada			
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5	U.S. Social Security Administration			
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9	Attorneys for Defendant			
10	UNITED STATES DISTRICT COURT			
11				
12	DISTRICT OF NEVADA			
13	LAS VEGA	S DIVISION		
14	WENDY W. BUBNA,	Case No. 2:18-cv-00677-JCM-VCF		
15	Plaintiff,	DEFENDANT'S UNOPPOSED		
16	vs.	MOTION TO EXTEND TIME		
17	NANCY A. BERRYHILL,) (Second Request)		
18	Acting Commissioner of Social Security,			
19	Defendant.)		
20)		
21	NANCY A. BERRYHILL, Acting Commissioner of Social Security ("Defendant" or the			
22	"Commissioner"), hereby moves this Honorable Court to grant her unopposed motion for a 30-day			

extension of time to file her response to Wendy W. Bubna's ("Plaintiff") Motion to Remand to Social Security Administration (the "Motion") (Docket Number 12). The current deadline is September 17, 2018 and the new deadline would be October 17, 2018. This is the second extension of time requested in the above-captioned matter, and it is the Commissioner's first request for an extension of time. The Commissioner requests this additional time because the above-captioned case is being transferred interoffice to another attorney in the agency who will need additional time to adequately consider and

UNOPPOSED MOTION AND PROPOSED ORDER

(Case No. 2:18-cv-00677-JCM-VCF)

1	address the issues Plaintiff raises in her Motion. Plaintiff's counsel has stated that Plaintiff does not		
2	oppose the Commissioner's request for additional time. The Commissioner further respectfully		
3	requests that the scheduling order be modified accordingly.		
4		Respectfully submitted,	
5	Dated: September 11, 2018	DAYLE ELIESON	
6		United States Attorney	
7		By: <u>/s/ Sharon Lahey</u> SHARON LAHEY	
8		Assistant Regional Counsel	
9			
10	ORDER		
11	Pursuant to Defendant's motion and the parties' agreement, IT IS SO ORDERED. Defendant		
12	shall file her response to Plaintiff's Motion to Remand to Social Security Administration on or before		
13	October 17, 2018. All other deadlines are modified accordingly.		
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15		Contactor	
16	9-12-2018 Dated:	Contant	
17		HON. CAM FERENBACH UNITED STATES MAGISTRATE JUDGE	
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	UNOPPOSED MOTION AND PROPOSED ORDER	(Case No. 2:18-cv-00677-JCM-VCF)	

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	Sharon.Lahey@ssa.gov		
9	Attorneys for Defendant	DISTRICT COURT	
10	UNITED STATES DISTRICT COURT		
11	DISTRICT OF NEVADA		
12	LAS VEGAS	DIVISION	
13) WENDY W. BUBNA,)	(Case No. 2:18-cv-00677-JCM-VCF)	
14) Plaintiff,)	CERTIFICATE OF SERVICE	
15) vs.)		
16 17	NANCY A. BERRYHILL,		
	Acting Commissioner of Social Security,		
18	Defendant.		
19)		
20	I, Sharon Lahey, Assistant Regional Counsel		
21	was served a copy of the foregoing DEFENDANT'S on September 11, 2018 via CM/ECF:	S UNOPPOSED MOTION TO EXTEND TIME	
22	Dichard A Harris Esa	Joshua R Harris, Esq.	
23	Richard A Harris, Esq. Richard Harris Law Firm	Richard Harris Law Firm	
24	801 South Fourth Street	801 South Fourth Street	
25	Las Vegas, NV 89101 Email: katie@richardharrislaw.com	Las Vegas, NV 89101 Email: josh@richardharrislaw.com	
26	Dated this 11th day of September, 2018	/s/ Sharon Lahey	
27		SHARON LAHEY	
		Assistant Regional Counsel	
28			
	CERTIFICATE OF SERVICE	(Case No. 2:18-cv-00677-JCM-VCF)	