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

13 SUSAN NEELY RUDITSKY,

14 Plaintiff,

15 v.

16 ANDREW SAUL,  
 Commissioner of Social Security,

17 Defendant.  
 18

) Case No.: 2:20-cv-01285-DJA  
 )  
 )  
 )

) **UNOPPOSED MOTION FOR**  
 ) **EXTENSION OF TIME TO RESPOND TO**  
 ) **PLAINTIFF’S MOTOIN FOR REVERAL**  
 ) **AND/OR REMAND (FIRST REQUEST)**

19 Defendant Andrew Saul, Commissioner of Social Security (“Defendant”) respectfully requests  
 20 that the Court extend the time for Defendant to respond to Plaintiff’s Motion for Reversal and/or  
 21 Remand (Motion) from March 25, 2021 to April 8, 2021. This is Defendant’s first request for  
 22 extension to respond to Plaintiff’s Motion and third request in this case. Defendant respectfully  
 23 requests this additional time because counsel was recently reassigned this case and has been out of the  
 24 office on leave. Counsel currently has three briefs due in other social security cases within the next  
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1 month and additionally has to train a new attorney hire. Counsel, therefore, requests an additional  
2 fourteen days to file Defendant's response. Counsel contacted Plaintiff on March 23, 2021 and  
3 Plaintiff does not object to this request.

4 This request is made in good faith with no intention to unduly delay the proceedings.

5 Counsel apologizes to the Court for any inconvenience caused by this delay.

6 Respectfully submitted this 23rd day of March 2021.

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8 CHRISTOPHER CHIOU  
9 Acting United States Attorney

10  
11 /s/ Chantal R. Jenkins  
12 CHANTAL R. JENKINS  
13 Special Assistant United States Attorney

14 OF COUNSEL:

15 DEBORAL LEE STACHEL  
16 Regional Chief Counsel, Region IX

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19 IT IS SO ORDERED

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21 \_\_\_\_\_  
22 UNITED STATES MAGISTRATE JUDGE

23 DATED: March 24, 2021

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**CERTIFICATE OF SERVICE**

I, Chantal R. Jenkins, certify that the following individual was served with a copy of the MOTION FOR EXTENSION OF TIME on the date and via the method of service identified below:

**Gerald Morris Welt**  
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*ATTORNEY TO BE NOTICED*

I declare under penalty of perjury that the foregoing is true and correct.

Dated: March 23, 2021

*/s/ Chantal R. Jenkins*  
CHANTAL R. JENKINS  
Special Assistant United States Attorney