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12 Attorneys for Defendant

13 **UNITED STATES DISTRICT COURT**

14 **DISTRICT OF NEVADA**

15 KRISTI NOEL O'BRIEN,)
16 Plaintiff,) Case No.: 2:20-cv-01673-BNW
17 v.)

18) **UNOPPOSED MOTION FOR**
19) **EXTENSION OF TIME**
20) **(FIRST REQUEST)**

21 ANDREW SAUL,)
22 Commissioner of Social Security,)
23 Defendant.)

24 Defendant Andrew Saul, Commissioner of Social Security (Defendant) respectfully requests
25 that the Court extend the time for Defendant to respond to Plaintiff's Motion for Reversal and/or
26 Remand (Dkt. No. 20, filed on May 17, 2021), currently due on June 16, 2021, by 30 days, through
and including July 16, 2021. Defendant further requests that all subsequent deadlines be extended
accordingly.

This is Defendant's first request for an extension of time. Good cause exists for this extension
due to Defendant's counsel's workload as described below. Since Plaintiff's motion was filed on May
17, 2021, Defendant's counsel has worked on over 8 district court cases and filed two Ninth Circuit

1 answering briefs. Counsel is also responsible for other substantive non-litigation matters in the Office
2 of General Counsel. The Office of General Counsel also currently has a number of attorneys out on
3 extended leaves of absence, in addition to staff attrition, which has increased the undersigned's
4 workload.

5 Additional time is required to review the record, to evaluate the numerous issues raised in
6 Plaintiff's motion, to determine whether options exist for settlement, and if not, to prepare Defendant's
7 response to Plaintiff's motion. Defendant's counsel will endeavor to complete these tasks as soon as
8 possible. This request is made in good faith and with no intention to unduly delay the proceedings,
9 and counsel apologizes for any inconvenience.

10 On June 1, 2021, counsel for Defendant conferred with Plaintiff's counsel, who has no
11 opposition to this motion.

12 It is therefore respectfully requested that Defendant be granted an extension of time to respond
13 to Plaintiff's Motion for Reversal and Remand, through and including July 16, 2021.

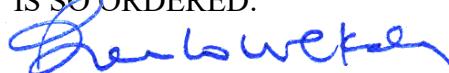
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15 Dated: June 1, 2021

Respectfully submitted,

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17 CHRISTOPHER CHIOU
Acting United States Attorney

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19 /s/ *Margaret Lehrkind*
20 MARGARET LEHRKIND
21 Special Assistant United States Attorney

22 IT IS SO ORDERED:

23 
24 UNITED STATES MAGISTRATE JUDGE

25 DATED: June 4, 2021