

Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

KRISTI NOEL O'BRIEN,

Plaintiff,

V.

ANDREW SAUL,
Commissioner of Social Security,

Defendant.

Case No.: 2:20-cv-01673-BNW

UNOPPOSED MOTION FOR EXTENSION OF TIME (*FIRST REQUEST*)

Defendant Andrew Saul, Commissioner of Social Security (Defendant) respectfully requests that the Court extend the time for Defendant to respond to Plaintiff's Motion for Reversal and/or 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,

16 CHRISTOPHER CHIOU
17 Acting United States Attorney

18 /s/ Margaret Lehrkind
19 MARGARET LEHRKIND
Special Assistant United States Attorney

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22 IT IS SO ORDERED:

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24 UNITED STATES MAGISTRATE JUDGE

25 DATED: June 4, 2021
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