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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

F.G. PINKSTON,
Plaintiff,
vs.
ANDREW SAUL,
Commissioner of Social Security,
Defendant.)
Case No.: 2:20-cv-01747-EJY
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MOTION FOR EXTENSION OF TIME;
~~[PROPOSED] ORDER~~
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(FIRST REQUEST)
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)

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. 30, filed on May 12, 2021 but served on May 10, 2021), currently due on June 9, 2021, by 30 days, through and including July 9, 2021. Defendant further requests that all subsequent deadlines set forth in the Court's scheduling order (Dkt. No. 26) be extended accordingly.

This is Defendant's first request for an extension of time. Good cause exists for this extension because Defendant's counsel is in the process of conferring with her client to determine whether this matter can be resolved by settlement. The additional requested time will also allow for potential settlement discussions with Plaintiff, and if the matter cannot be resolved, to allow counsel to prepare a response to Plaintiff's pending motion. Defendant's counsel will endeavor to complete these tasks as soon as possible. However, counsel currently has seven cases in the active briefing stage that also require her attention. This request is made in good faith and with no intention to unduly delay the proceedings, and counsel apologizes for any inconvenience.

On June 2, 2021, counsel for Defendant conferred with Plaintiff, who opposes this motion.

It is therefore respectfully requested that Defendant be granted an extension of time to respond to Plaintiff's Motion for Reversal and Remand, through and including July 9, 2021.

Dated: June 2, 2021

CHRISTOPHER CHIOU
Acting United States Attorney

/s/ Allison J. Cheung
ALLISON J. CHEUNG
Special Assistant United States Attorney

IT IS SO ORDERED.

Elayna J. Zouachah
U.S. MAGISTRATE JUDGE

Dated: June 3, 2021