

1 Hal Taylor, Esq.
2 Of Counsel, Olinsky Law Group
3 NV Bar No.: 4399
4 2551 West Lakeridge Shores
5 Reno, NV 89519
6 Tel: (775) 825-2223
7 Fax: (775) 329-1113
8 Email: HalTaylorLawyer@gbis.com

9 Attorney for Plaintiff

10

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

13 Margaret Rose Curry,)
14 Plaintiff,) CASE NO.
15 v.) 2:21-cv-00555
16 Defendant.)
17) **CONSENT MOTION**
18) **FOR EXTENSION OF TIME TO FILE**
19) **PLAINTIFF'S BRIEF**
20)
21)
22)
23)
24)
25)
26)
27)
28)

Plaintiff by their attorney, moves for a 61 day extension of time to file Plaintiff's
Opening Brief. Plaintiff's opening brief is currently due to be filed January 12, 2022.

Due to the backlog of transcripts created by COVID-19 and the Commissioner's
response, the Commissioner is able to produce records at a rapid pace. As a result, this has
caused multiple, simultaneous filing deadlines that cannot be met by Plaintiff's Counsel.
Wherefore, Plaintiff requests an extension from January 12, 2022 up to and including March 14,

¹ Kilolo Kijakazi became the Acting Commissioner of Social Security on 7/9/2021. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Kilolo Kijakazi should be substituted for Andrew Saul as the Defendant in this suit.

1 2022 to file their brief. Counsel for the Plaintiff has conferred with Defendant's Counsel who
2 kindly consents to this request.

3 Dated January 6, 2022.
4

5 Respectfully submitted,

6 */s/Hal Taylor*
7 Hal Taylor, Esq.
8 Of Counsel, Olinsky Law Group
9 NV Bar No.: 4399
10 2551 West Lakeridge Shores
11 Reno, NV 89519
12 Tel: (775) 825-2223
13 Fax: (775) 329-1113
14 HalTaylorLawyer@GBIS.com

15 **Plaintiff's Certificate of Service:**

16 I certify that I caused the Motion for Extension of Time to be served today, January 6,
17 2022, by CMECF to Daniel Talbert who are filing users of the CM/ECF system.
18

19 */s/Hal Taylor*
20 Hal Taylor, Esq.
21 Of Counsel, Olinsky Law Group
22 NV Bar No.: 4399
23 2551 West Lakeridge Shores
24 Reno, NV 89519
25 Tel: (775) 825-2223
26 Fax: (775) 329-1113
27 HalTaylorLawyer@GBIS.com

28
29 IT IS SO ORDERED.
30 Dated: January 10, 2022

31 
32 UNITED STATES MAGISTRATE JUDGE