

Attorney for Plaintiff

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

Margaret Rose Curry,

Plaintiff,

V.

KILOLO KIJAKAZI¹,
COMMISSIONER OF SOCIAL SECURITY,

Defendant.

CASE NO.
2:21-cv-00555

**CONSENT MOTION
FOR EXTENSION OF TIME TO FILE
PLAINTIFF'S BRIEF**

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.

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

Dated January 6, 2022.

Respectfully submitted,

/s/Hal Taylor

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Plaintiff's Certificate of Service:

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

/s/Hal Taylor

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IT IS SO ORDERED.

Dated: January 10, 2022


UNITED STATES MAGISTRATE JUDGE