

1 JASON M. FRIERSON
2 United States Attorney
Nevada Bar No. 7709

3 ANDREA BANKS, CSBN 275286
4 Special Assistant United States Attorney
160 Spear Street, Suite 800
5 San Francisco, California 94105
Telephone: (510) 970-4803
6 Facsimile: (415) 744-0134
E-Mail: andrea.banks@ssa.gov
7 *Attorneys for Defendant*

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 TORRANCE CARR,

12 Plaintiff,

13 vs.

14 KILILO KIJAKAZI,
Acting Commissioner of Social Security,

15 Defendant.
16

)
) Case No.: 2:22-cv-01069-DJA
)

) **UNOPPOSED MOTION FOR EXTENSION OF**
) **TIME TO FILE DEFENDANT'S CROSS-**
) **MOTION TO AFFIRM AND RESPONSE TO**
) **PLAINTIFF'S MOTION FOR REVERSAL**

) **(FIRST REQUEST)**
)
)

1 Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security (the "Commissioner"), by
2 and through her undersigned attorneys, hereby moves for a 10-day extension of time to file Defendant's
3 Cross-Motion to Affirm and Response to Plaintiff's Motion for Reversal. The current deadline is January
4 13, 2023. This is the Commissioner's first request for an extension of time.

5 Defendant submits that good cause exists for this extension request. Defendant's counsel is
6 conferring with her client regarding the issues raised in this case and possible settlement. Defendant
7 respectfully requests a 10 day extension to allow time for a response from her client.

8 On January 12, 2023, the undersigned conferred with Plaintiff's counsel, who has no opposition to
9 the requested extension.

10 It is therefore respectfully requested that Defendant be granted an extension of time to file Cross-
11 Motion to Affirm and Response to Plaintiff's Motion for Reversal, through and including Monday, January
12 23, 2023.

13 Dated: January 12, 2023

14 JASON M. FRIERSON
United States Attorney

15 /s/ Andrea Banks
16 ANDREA BANKS
Special Assistant United States Attorney
17 Attorneys for Defendant

18
19 IT IS SO ORDERED:

20 
21 UNITED STATES MAGISTRATE JUDGE

22 DATED: January 17, 2023
23
24
25
26

CERTIFICATE OF SERVICE

I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My business address is 160 Spear Street, Suite 800, San Francisco, California 94105. I am not a party to the above-entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR EXTENSION OF TIME TO FILE DEFENDANT'S CROSS-MOTION TO AFFIRM AND RESPONSE TO PLAINTIFF'S MOTION FOR REVERSAL** on the following parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which provides electronic notice of the filing:

Leonard Stone
Shook & Stone, Chtd.
710 S Fourth Street
Las Vegas, NV 89101
702-385-2220
Email: lstone@shookandstone.com

Marc V Kalagian
Law Offices of Lawrence D. Rohlfing, Inc., CPC
12631 East Imperial Highway,
Suite C115
Santa Fe Springs, CA 90670
(562) 273-3702
Fax: (562) 868-5491
Email: marc.kalagian@rksslaw.com
Attorneys for Plaintiff

I declare under penalty of perjury that the foregoing is true and correct.

Dated: January 12, 2023

/s/ Andrea Banks
ANDREA BANKS
Special Assistant United States Attorney