

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

3 MICHONNE L. OMO, SB IL 6309833
4 Special Assistant United States Attorney
160 Spear Street, Suite 800
5 San Francisco, California 94105
Telephone: (510) 970-4845
Facsimile: (415) 744-0134
6 E-Mail: michonne.omo@ssa.gov
7 Attorneys for Defendant

8

9 **UNITED STATES DISTRICT COURT**

10 **DISTRICT OF NEVADA**

11 DYLAN STATON,)
12 Plaintiff,) Case No.: 2:22-cv-01139-DJA
13 vs.)
14 KILIGO KIJAKAZI,) **UNOPPOSED MOTION FOR EXTENSION OF**
15 Acting Commissioner of Social Security,) **TIME TO FILE CERTIFIED**
16 Defendant.) **ADMINISTRATIVE RECORD AND ANSWER**
17) **(FIRST REQUEST)**
18
19
20
21
22
23
24
25
26

1 Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security (the “Commissioner”), by
2 and through her undersigned attorneys, hereby moves for a 60-day extension of time to file the Certified
3 Administrative Record (CAR) and answer to Plaintiff’s Complaint. The CAR and answer to Plaintiff’s
4 Complaint are due to be filed by September 26, 2022. This is the Commissioner’s first request for an
5 extension of time.

6 Defendant submits that good cause exists for this extension request. There was a mix-up when
7 the Office of the General Counsel was notified of this case, and the Office of Appellate Operations
8 (which prepares and certifies the certified administrative record) did not receive notice of this case until
9 recently. The undersigned apologizes for this delay. OAO has requested the undersigned seek 60 days
10 for them to prepare the CAR.

11 Accordingly, Defendant requests an extension in which to respond to the Complaint until
12 November 25, 2022. If Defendant is unable to produce the certified administrative record necessary to
13 file an Answer in accordance with this Order, Defendant shall request an additional extension prior to the
14 due date.

15 The undersigned conferred with Plaintiff’s counsel, who confirmed on September 15, 2022, that
16 Plaintiff has no opposition to the requested extension.

17 It is therefore respectfully requested that Defendant be granted an extension of time to file the CAR
18 and answer to Plaintiff’s Complaint, through and including November 25, 2022.

19 //

20 //

21 //

22 //

23 //

24 //

25 //

1 Dated: September 15, 2022
2
3
4
5
6
7

JASON M. FRIERSON
United States Attorney

8 /s/ *Michonne L. Omo*
9 MICHONNE L. OMO
10 Special Assistant United States Attorney
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

IT IS SO ORDERED:


8
9 DANIEL J. ALBREGTS
10 UNITED STATES MAGISTRATE JUDGE
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26

DATED: September 16, 2022

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 CERTIFIED ADMINISTRATIVE RECORD AND ANSWER** 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:

Hal Taylor
haltaylorlawyer@gbis.com

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

Dated: September 15, 2022

/s/ Michonne L. Omo
MICHONNE L. OMO
Special Assistant United States Attorney