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11 Attorneys for Defendant

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

14 SHARI EIKO YAMASHIRO,

15 Plaintiff,

16 v.

17 KILOLO KIJAKAZI,
18 Commissioner of Social Security,

19 Defendant.

) Case No.: 2:22-cv-01656-BNW

) **UNOPPOSED MOTION FOR**
) **EXTENSION OF TIME**
) **(FIRST REQUEST)**

20 Defendant, Kilolo Kijakazi, Acting Commissioner of Social Security (Defendant) respectfully
21 requests that the Court extend the time for Defendant to respond to Plaintiff’s Motion for Reversal and
22 Remand (Dkt. No. 23, filed on April 19, 2023), currently due on May 19, 2023, by 35 days, through
23 and including June 23, 2023. Defendant further requests that all subsequent deadlines be extended
24 accordingly. This is Defendant’s first request for an extension of time to file a response.

25 Good cause exists for this extension. Defendant respectfully requests this additional time
26 because Defendant’s counsel is experiencing an extremely heavy workload, despite due diligence. In
addition to this case, the undersigned is preparing the Commissioner’s response briefs for multiple
cases with concurrent deadlines in district and appellate courts. The undersigned currently has four

1 district court briefs and one appellate court brief due within approximately one week surrounding the
2 current due date of the response brief in this case. For this reason, Defendant's counsel requires
3 additional time to properly address the issues raised in Plaintiff's Motion for Reversal and Remand.
4 This request is made in good faith and with no intention to unduly delay the proceedings.

5 Counsel for Defendant advised counsel for Plaintiff of the need for this extension on May 17,
6 2023. Counsel for Plaintiff's confirmed that Plaintiff does not object to this request.

7 It is therefore requested that Defendant be granted an extension of time to respond to Plaintiff's
8 Motion for Reversal and Remand, through and including June 23, 2023.

9
10 Dated: May 17, 2023

Respectfully submitted,

11 JASON M. FRIERSON
12 United States Attorney

13 */s/ David Priddy*
14 DAVID PRIDDY
15 Special Assistant United States Attorney

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17 IT IS SO ORDERED:

18 
19 UNITED STATES MAGISTRATE JUDGE

20 DATED: May 18, 2023

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 6401 Security Boulevard, Baltimore, Maryland 21235. 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 (FIRST REQUEST)** 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:

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Attorney for Plaintiff

Dated: May 17, 2023

/s/ David Priddy
DAVID PRIDDY
Special Assistant United States Attorney