

1 JASON M. FRIERSON, NVSBN 7709  
2 United States Attorney  
3 District of Nevada

4 DAVID PRIDDY, ILSBN 6313767  
5 Special Assistant United States Attorney  
6 Social Security Administration  
7 Office of the General Counsel, Office 7  
8 6401 Security Boulevard  
9 Baltimore, MD 21235  
10 Telephone: (510) 970-4801  
11 Facsimile: (415) 744-0134  
12 E-Mail: David.Priddy@ssa.gov

13 Attorneys for Defendant

14 **UNITED STATES DISTRICT COURT**  
15 **DISTRICT OF NEVADA**

16 NICHOLE FRASER NICHOLS )

17 Plaintiff, )

18 v. )

19 MARTIN O’MALLEY, )  
20 Commissioner of Social Security, )

21 Defendant. )

Case No.: 2:24-cv-00087-EJY

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

22 Defendant, Martin O’Malley, Commissioner of Social Security (Defendant), respectfully  
23 requests that the Court extend the time for Defendant to respond to Plaintiff’s Brief (Dkt. No. 9, filed  
24 on April 10, 2024), currently due on May 10, 2024, by 31 days, through and including June 10, 2024.  
25 Defendant further requests that the deadline for Plaintiff’s optional reply brief be extended to June 24,  
26 2024.

This is Defendant’s first request for an extension of time to file a response. Good cause exists  
for this extension. Counsel is currently in the process of determining whether a settlement agreement  
is possible in this case and needs additional time to consider this option. If the case cannot be settled,

1 then Defendant's counsel will proceed with filing Defendant's response to Plaintiff's Brief by the new  
2 due date of June 10, 2024. Counsel for Defendant advised counsel for Plaintiff of the need for this  
3 extension on May 8, 2024. Counsel for Plaintiff confirmed that Plaintiff does not object to this  
4 request.

5 It is therefore requested that Defendant be granted an extension of time to respond to Plaintiff's  
6 Brief, through and including June 10, 2024. This request is made in good faith and with no intention  
7 to unduly delay the proceedings.

8  
9 Dated: May 9, 2024

Respectfully submitted,

10 JASON M. FRIERSON  
11 United States Attorney

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

15  
16 IT IS SO ORDERED:

17   
18 UNITED STATES MAGISTRATE JUDGE

19 DATED: May 9, 2024