

1 Hal Taylor, Esq.
 2 Of Counsel, Olinsky Law Group
 3 NV Bar No.: 4399
 4 2551 West Lakeridge Shores
 5 Reno, NV 89519
 6 Tel: (775) 825-2223
 7 Fax: (775) 329-1113
 8 Email: HalTaylorLawyer@gbis.com

9 Destiny Williams, Esq.
 10 *Admitted Pro Hac Vice*
 11 NC Bar No.: 54381
 12 250 S. Clinton Street, Suite 210
 13 Syracuse, NY 13202
 14 Tel: (315) 701-5780
 15 Fax: (315) 701-5781
 16 Email: dwilliams@windisability.com
 17 Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
 DISTRICT OF NEVADA**

14 TAMMI J. JOHNSON,)	
)	
15 Plaintiff,)	CASE NO.
)	2:24-cv-01156-EJY
16 v.)	
)	UNOPPOSED MOTION FOR
)	EXTENSION OF TIME TO FILE
18 MARTIN O'MALLEY,)	PLAINTIFF'S OPENING BRIEF
19 COMMISSIONER OF SOCIAL SECURITY,)	NUNC PRO TUNC
)	
20 Defendant.)	
)	

22 PLEASE TAKE NOTICE that Plaintiff, Tammi J. Johnson, by her attorneys, Olinsky
 23 Law Group, Hal Taylor, Esq. and Destiny Williams, Esq., will move and hereby does move this
 24 Court, for an extension of time to Plaintiff's Opening Brief, *nunc pro tunc*. Plaintiff's Brief was
 25 due Wednesday, November 20, 2024. Counsel seeks a one (1) day extension of time, or up to
 26 and including Thursday, November 21, 2024, in which to file the Opening Brief. This request
 27 will not cause Defendant any undue hardship, and Plaintiff's counsel has conferred with
 28

1 Defendant's counsel, who has no objection. This is the first such request submitted by Plaintiff in
2 this matter.

3 Counsel requests this extension due to technical difficulties with Attorney Williams'
4 Pacer Account. Counsel attempted to file this brief on November 20, 2024; however, she
5 received an error message, and her account remained inactive until 7:26AM EST on November
6 21, 2024. Therefore, Counsel is seeking a short extension to submit the Opening Brief now that
7 her account is operating properly. Counsel apologizes profusely for this any resulting delay and
8 will file Plaintiff's Opening Brief immediate after filing this Motion.
9
10

11 The undersigned thus respectfully requests the relief requested in the proposed order filed
12 with the Court this day.

13 Dated November 21, 2024.

14 Respectfully submitted,

15 /s/ Destiny Williams
16 Destiny Williams, Esq.
17 *Admitted Pro Hac Vice*
18 NC Bar No.: 54381
19 250 S. Clinton Street, Suite 210
20 Syracuse, NY 13202
21 Tel: (315) 701-5780
22 Fax: (315) 701-5781
23 Email: dwilliams@windisability.com
24 Attorney for Plaintiff

/s/Hal Taylor
Hal Taylor, Esq.
Of Counsel, Olinsky Law Group
NV Bar No.: 4399
2551 West Lakeridge Shores
Reno, NV 89519
Tel: (775) 825-2223
Fax: (775) 329-1113
Email: HalTaylorLawyer@gbis.com
Attorney for Plaintiff

25 IT IS SO ORDERED this 21st day of November, 2024.

26 

27 EILAYNA J. YOUCHAH
28 UNITED STATES MAGISTRATE JUDGE