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10 Attorneys for Defendant

11 **UNITED STATES DISTRICT COURT**
12 **DISTRICT OF NEVADA**
13 **(LAS VEGAS)**

14 KIMBERLEY CHRISTIAN,

15 Plaintiff,

16 v.

17 CAROLYN COLVIN,
18 Acting Commissioner of Social Security,¹

19 Defendant.

) Case No.: 2:24-cv-02073-MDC

) **UNOPPOSED MOTION FOR**
) **EXTENSION OF TIME TO FILE**
) **CERTIFIED ADMINISTRATIVE**
) **RECORD**
) **(FIRST REQUEST)**

20
21 Defendant, Carolyn Colvin, Acting Commissioner of Social Security (the “Commissioner”), by
22 and through her undersigned attorneys, hereby moves for a 30-day extension of time to file the
23 Certified Administrative Record (CAR) to Plaintiff’s Complaint. The CAR to Plaintiff’s Complaint is
24

25 ¹ Carolyn Colvin became the Acting Commissioner of Social Security on November 30, 2024.
26 Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Carolyn Colvin should be substituted
for Martin O’Malley as the defendant in this suit. No further action need be taken to continue this suit
by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 due to be filed by January 6, 2025. This is Defendant's first request for an extension of time.
2 Defendant requests this extension because Defendant has been notified that the CAR is not yet
3 available, and that additional time is needed to prepare it. Defendant therefore cannot respond to
4 Plaintiff's Complaint. Once the CAR arrives, Defendant will need to review it for defects before
5 submitting it.

6
7 For these reasons, Defendant requests an extension in which to respond to the Complaint until
8 February 5, 2025.

9 On December 17, 2024, the undersigned conferred with Plaintiff's counsel, who has no
10 opposition to the requested extension.

11 It is therefore respectfully requested that Defendant be granted an extension of time to file the
12 CAR to Plaintiff's Complaint, through and including February 5, 2025.

13
14 Dated: December 17, 2024

Respectfully submitted,

15 JASON M. FRIERSON
16 United States Attorney

17 */s/ Franco L. Becia*
18 FRANCO L. BECIA
Special Assistant United States Attorney

19
20
21 IT IS SO ORDERED:

22 
23 _____
UNITED STATES MAGISTRATE JUDGE

24 DATED: 1-3-25
25 _____
26

1 **CERTIFICATE OF SERVICE**

2 I, the undersigned, am a citizen of the United States and am at least eighteen years of age. My
3 business address is 6401 Security Boulevard, Baltimore, MD 21235. I am not a party to the above-
4 entitled action. On the date set forth below, I caused service of **UNOPPOSED MOTION FOR**
5 **EXTENSION OF TIME TO FILE CERTIFIED ADMINISTRATIVE RECORD** on the following
6 parties by electronically filing the foregoing with the Clerk of the District Court using its ECF System,
7 which provides electronic notice of the filing to:

8 **Leonard Stone**

9 Shook & Stone, Chtd.
10 710 S Fourth Street
11 Las Vegas, NV 89101
12 702-385-2220
13 Fax: 702-384-0394
14 Email: lstone@shookandstone.com

15 **Marc V Kalagian**

16 Law Offices of Lawrence D. Rohlfing, Inc., CPC
17 12631 East Imperial Highway, Suite C115
18 Santa Fe Springs, CA 90670
19 702-273-3702
20 Fax: 702-868-5491
21 Email: marc.kalagian@rksslaw.com I declare under penalty of perjury that the foregoing is true and
22 correct.

23 Dated: December 17, 2024

24 /s/ Franco L. Becia
25 Franco L. Becia
26 Special Assistant United States Attorney