

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
WESTERN DIVISION

*Granted.
Hon. L. Lott
5/6/14*

NINA PORTER,)	
)	CASE NO. 1:13 cv 522
Plaintiff,)	
)	JUDGE DLOTT
v.)	
)	MAGISTRATE JUDGE LITKOVITZ
CAROLYN W. COLVIN,)	
Commissioner of Social Security,)	
)	
Defendant.)	

MOTION FOR LEAVE TO FILE INSTANTER
DEFENDANT’S OPPOSITION TO PLAINTIFF’S STATEMENT OF ERRORS

Defendant, Acting Commissioner of Social Security, hereby moves this Court for leave to file instanter Defendant’s Opposition to Plaintiff’s Statement of Errors. The deadline to file Defendant’s Opposition to Plaintiff’s Statement of Errors was May 5, 2014. On that evening, the undersigned, Assistant Regional Counsel Deepa Rajkarne experienced unfortunate, unexpected internal-system computer issues, which prevented timely filing. Accordingly, the undersigned respectfully requests that she be allowed to file Defendant’s Opposition to Plaintiff’s Statement of Errors instanter.

Respectfully submitted,

/s/Deepa Rajkarne
Deepa Rajkarne
Special Assistant United States Attorney
200 W. Adams Street, 30th Floor
Chicago, Illinois 60606
(877) 800-7578 (phone)
(312) 353-5876 (fax)

PROOF OF SERVICE

I hereby certify that, accordingly, on May 6, 2014, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

Shoshana R. Pehowic

/s/ Deepa Rajkarne

Deepa Rajkarne

Assistant Regional Counsel

200 West Adams Street, 30th Floor

Chicago, Illinois 60606

(877) 800-7578, Ext. 19154 (telephone)

(312) 866-1395 (facsimile)

deepa.rajkarne@ssa.gov