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13 Attorneys for Defendant

14 **UNITED STATES DISTRICT COURT**
15 **EASTERN DISTRICT OF CALIFORNIA**

16 SHANNON RENEE HAGAN,) Case No.: 2:14-cv-02464-EFB
17 Plaintiff,) STIPULATION AND ~~PROPOSED~~ ORDER
18 vs.) FOR AN EXTENSION OF TIME
19 CAROLYN W. COLVIN,)
20 Acting Commissioner of Social Security,)
21 Defendant.)

22 IT IS HEREBY STIPULATED, by and between the parties, through their respective
23 counsel of record, that the time for responding to Plaintiff's Motion for Summary Judgment be
24 extended from May 13, 2015 to June 12, 2015. This is Defendant's first request for an extension
25 of time to respond to Plaintiff's motion. An extension of time is needed given Defense counsel's
26 workload, and in order for counsel to review and respond to the issues raised in Plaintiff's
motion. The parties further stipulate that the Court's Scheduling Order shall be modified
accordingly.

27 Counsel apologizes to the Court for any inconvenience caused by this delay.
28

1 Dated: 5/11/2015

Respectfully submitted,
/s/ Joseph C. Fraulob
(As authorized via email on 5/11/2015)
JOSEPH C. FRAULOB
Attorney for Plaintiff

5 Dated: 5/11/2015

6 BENJAMIN B. WAGNER
7 United States Attorney
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10 Social Security Administration

11 By:

12 /s/ Jacob M. Mikow
13 JACOB M. MIKOW
14 Special Assistant United States Attorney
15 Attorneys for Defendant

16 OF COUNSEL:

17 In Seon Jeong
18 Assistant Regional Counsel

19 ORDER

20 APPROVED AND SO ORDERED.

21 Dated: May 13, 2015.

22 
23 EDMUND F. BRENNAN
24 UNITED STATES MAGISTRATE JUDGE