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

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

IT IS HEREBY STIPULATED, by and between the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Summary Judgment be extended from May 13, 2015 to June 12, 2015. This is Defendant's first request for an extension of time to respond to Plaintiff's motion. An extension of time is needed given Defense counsel's 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.

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

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

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By: /s/ Jacob M. Mikow
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Attorneys for Defendant

11 OF COUNSEL:

12 In Seon Jeong
13 Assistant Regional Counsel

16 ORDER

18 APPROVED AND SO ORDERED.

19 Dated: May 13, 2015.

20 
EDMUND F. BRENNAN
UNITED STATES MAGISTRATE JUDGE