(SS)Hagan v	Commissioner of Social Security			
1	1 BENJAMIN B. WAGNER   1 United States Attorney			
2				
3	Regional Chief Counsel, Region IX			
	Social Security Administration JACOB M. MIKOW, CSBN 238045			
4	Special Assistant United States Attorney			
5	160 Spear Street, Suite 800			
6	San Francisco, CA 94105 Telephone: 415-977-8976			
7	Fax: 415-744-0134			
8	Jacob.Mikow@ssa.gov			
	Attorneys for Defendant			
9 UNITED STATES DISTRICT COURT				
10	EASTERN DISTRICT OF CALIFORNIA			
11				
12	) Case No.: 2:14-cv-02464-EFB			
13	SHANNON RENEE HAGAN, ) STIPULATION AND <del>PROPOSED</del> ORDER			
14	Plaintiff, ) FOR SECOND EXTENSION OF TIME			
	vs. )			
15				
16	CAROLYN W. COLVIN,			
17	Acting Commissioner of Social Security,			
18	) Defendant.			
19				
	20 IT IS HEREBY STIPULATED, by and between the parties, through their respective			
21	counsel of record, that the time for responding to Plaintiff's Motion for Summary Judgment be			
22	extended from June 12, 2015 to July 10, 2015. This is Defendant's second request for an			
23	extension of time to respond to Plaintiff's motion.			
24	L			
25	Assistant Regional Counsel In Seon Jeong was assigned to this case and has diligently			
26	attempted to complete Defendant's responsive brief in a timely matter. However, the			
27	undersigned counsel for Defendant seeks this extension due to the press of workload including a			
28	high volume of other disability matters. The parties further stipulate that the Court's Scheduling			
Ingh volume of other disability matters. The parties further supulate that the Court s				
	Stip. & Prop. Order for Ext.; 2:14-cv-02464-EFB 1			

1	Order shall be modified accordingly.	Couns	sel apologizes to the Court for any inconvenience	
2	caused by this delay.			
3				
4			Respectfully submitted,	
5	Dated: 6/11/2015		/s/ Joseph C. Fraulob (As authorized via email on 6/11/2015)	
6			JOSEPH C. FRAULOB	
7			Attorney for Plaintiff	
8	Dated: 6/11/2015		BENJAMIN B. WAGNER	
9			United States Attorney DONNA CALVERT	
10			Regional Chief Counsel, Region IX	
11			Social Security Administration	
12		By:	<u>/s/ Jacob M. Mikow</u> JACOB M. MIKOW	
13			Special Assistant United States Attorney	
14			Attorneys for Defendant	
15	OF COUNSEL: In Seon Jeong Assistant Regional Counsel			
16				
17				
18				
19	ORDER			
20				
21	APPROVED AND SO ORDERED. Dated: June 12, 2015. EDMUND F. BRENNAN UNITED STATES MAGISTRATE JUDGE			
22 23				
23 24				
24 25				
23 26				
20				
28				
	Stip. & Prop. Order for Ext.; 2:14-cv-02464-EFB 2			