

1 PHILLIP A. TALBERT  
 United States Attorney  
 2 MATHEW W. PILE, WSBA No. 32245  
 Associate General Counsel  
 3 Office of Program Litigation, Office 7  
 4 NOAH SCHABACKER, Maryland Bar  
 Special Assistant United States Attorney  
 5 Office of the General Counsel  
 Social Security Administration  
 6 6401 Security Boulevard  
 7 Baltimore, MD 21235  
 Telephone: (303) 844-6232  
 8 Email: Noah.Schabacker@ssa.gov

9 Attorneys for Defendant

10  
 11 **UNITED STATES DISTRICT COURT**  
 12 **EASTERN DISTRICT OF CALIFORNIA**  
 13

14	JAY LAWRENCE STINEMAN,	)	CIVIL NO. 2:24-cv-02125-CSK
15	Plaintiff,	)	<b>STIPULATION TO VOLUNTARY      REMAND PURSUANT TO SENTENCE      FOUR OF 42 U.S.C. § 405(g) AND TO      ENTRY OF JUDGMENT; [PROPOSED]      ORDER</b>
16	v.	)	
17	CAROLYN COLVIN,	)	
18	Acting Commissioner of Social Security,	)	
19	Defendant.	)	

20 IT IS STIPULATED by and between Plaintiff (“Plaintiff”) and Defendant Carolyn  
 21 Colvin, Acting Commissioner of Social Security (“Commissioner”), through their undersigned  
 22 counsel of record, that the above-entitled action shall be remanded to the Commissioner for  
 23 further administrative proceedings.

24 On remand, the Commissioner will develop the record as necessary; reconsider all  
 25 relevant issues; offer the claimant the opportunity to submit additional evidence; and issue a  
 26 new decision. The parties further request that the Court direct the Clerk of the Court to enter a  
 27  
 28

STIPULATION TO REMAND

1 final judgment in favor of Plaintiff, and against Defendant, reversing the final decision of the  
2 Commissioner.

3 This stipulation constitutes a remand under the fourth sentence of Section 205(g) of the  
4 Social Security Act, 42 U.S.C. 405(g).

5 Dated: January 6, 2025

/s/ Francesco P. Benavides\*

6 FRANCESCO P. BENAVIDES

7 Attorney for Plaintiff

\*Authorized via e-mail on January 3, 2025

8 PHILLIP A. TALBERT

9 United States Attorney

10 MATHEW W. PILE

Associate General Counsel

11 Office of Program Litigation, Office 7

12 Social Security Administration

13 By: /s/ Noah Schabacker

14 NOAH SCHABACKER

Special Assistant United States Attorney

15 Attorneys for Defendant

16 **[PROPOSED] ORDER**

17 Based upon the parties' Stipulation to Voluntary Remand Pursuant to Sentence Four of  
18 42 U.S.C. § 405(g) and to Entry of Judgment ("Stipulation to Remand"), and for cause shown,

19 **IT IS ORDERED** that the above-captioned action is remanded to the Commissioner of Social  
20 Security for further proceedings pursuant to the fourth sentence of Section 205(g) of the Social  
21 Security Act, 42 U.S.C. 405(g).

22 DATED: January 7, 2025

23 

24 HON. CHI SOO KIM

25 UNITED STATES MAGISTRATE JUDGE

26 5, stin.2125.24