

1 BRIAN J. STRETCH, CSBN 163973
United States Attorney
2 DEBORAH LEE. STACHEL, CSBN 230138
Regional Chief Counsel
3 DANIEL P. TALBERT, SNB OH 0084088
Special Assistant United States Attorney
4 Social Security Administration
160 Spear Street, Suite 800
5 San Francisco, CA 94105
Telephone: (415) 977-8995
6 Facsimile: (415) 977-8873
Attorneys for Defendant
7

8
9
10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA
12 OAKLAND DIVISION

13
14 MARLO L. MOSQUEDA,
15 Plaintiff,

16 v.

17 CAROLYN W. COLVIN,
Acting Commissioner of Social Security,
18 Defendant.

No. 4:15-cv-06082-KAW

STIPULATION AND ~~PROPOSED~~ ORDER TO
REMAND FOR FURTHER PROCEEDINGS
PURSUANT TO SENTENCE FOUR OF 42
U.S.C. § 405(g), AND FOR ENTRY OF
JUDGMENT IN FAVOR OF PLAINTIFF

19
20 The parties stipulate by counsel to remand this case to the Commissioner for further
21 administrative proceedings. Upon remand, the administrative law judge (ALJ) will obtain the
22 assistance of a medical expert in evaluating Plaintiff's physical impairments; evaluate the medical
23 source opinions; give further consideration to Plaintiff's residual functional capacity and provide
24 appropriate rationale with specific references to evidence of record in support of the assessed
25 limitations; obtain supplemental vocational expert evidence; offer Plaintiff the opportunity for a
26 hearing, take any further action needed to complete the administrative record, and issue a new
27 decision.

28 //

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25
26
27
28

Respectfully submitted September 23, 2016.

DATED: September 23, 2016

/s/ Cyrus Safa
CYRUS SAFA
(as authorized by email)
Attorney for Plaintiff

BRIAN J. STRETCH
United States Attorney

DATED: September 23, 2016

By s/ Daniel P. Talbert
DANIEL P. TALBERT
Special Assistant United States Attorney

Attorneys for Defendant

ORDER

Pursuant to stipulation, it is so ordered.

DATE: 9/27/16

Kandis Westmore
HON. KANDIS A. WESTMORE
UNITED STATES MAGISTRATE JUDGE