

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 11-cv-00693-AP

JULIE A. SHRANK,
Plaintiff,

v.

MICHAEL J. ASTRUE, Commissioner of Social Security,
Defendant.

JOINT CASE MANAGEMENT PLAN FOR SOCIAL SECURITY CASES

1. APPEARANCES OF COUNSEL AND *PRO SE* PARTIES

For Plaintiff:

Alan M. Agee
512 S. 8th Street
Colorado Springs, CO 80905
(719) 473-1515
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For Defendant:

John F. Walsh

United States Attorney
Kevin T. Traskos
Deputy Civil Chief
United States Attorney's Office
District of Colorado

William G. Pharo
United States Attorney Office
District of Colorado

Michael Howard
Special Assistant United States Attorney
Office of the General Counsel
Social Security Administration
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2. STATEMENT OF LEGAL BASIS FOR SUBJECT MATTER JURISDICTION

The Court has jurisdiction based on section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

3. DATES OF FILING OF RELEVANT PLEADINGS

A. Date Complaint was filed: March 18, 2011

B. Date Complaint was served on U.S. Attorney's Office: March 21, 2011

C. Date Answer and Administrative Record were filed: May 23, 2011

4. STATEMENT REGARDING THE ADEQUACY OF THE RECORD

Plaintiff's counsel states that the administrative record may be missing records that have previously been submitted to the Appeals Council. Otherwise the administrative record is complete.

Defendant's counsel states, to the best of his knowledge, that the administrative record is complete.

5. STATEMENT REGARDING ADDITIONAL EVIDENCE

Plaintiff does not intend to submit additional evidence unless records are missing that have been previously submitted to the Appeals Council.

Defendant does not intend to submit additional evidence.

6. STATEMENT REGARDING WHETHER THIS CASES RAISES UNUSUAL CLAIMS OR DEFENSES

The parties, to the best of their knowledge, do not believe the case raises unusual claims or defenses.

7. OTHER MATTERS

The parties have no other matters to bring to the attention of the Court.

8. BRIEFING SCHEDULE

The parties respectfully request the following briefing schedule

A. Plaintiff's opening brief due: **July 23, 2011**

B. Defendant's response brief due: **August 22, 2011**

C. Plaintiff's reply brief (if any) due: **September 6, 2011**

9. STATEMENTS REGARDING ORAL ARGUMENT

A. Plaintiff requests oral argument.

B. Defendant does not request oral argument.

10. CONSENT TO EXERCISE OF JURISDICTION BY MAGISTRATE JUDGE

All parties have consented to the exercise of jurisdiction of a United States Magistrate Judge.

11. OTHER MATTERS

THE PARTIES FILING MOTIONS FOR EXTENSION OF TIME OR CONTINUANCES MUST COMPLY WITH D.C. COLO.L.CivR. 7.1(C) BY SUBMITTING PROOF THAT A COPY OF THE MOTION HAS BEEN SERVED UPON ALL ATTORNEYS OF RECORD AND ALL *PRO SE* PARTIES.

12. AMENDMENTS TO JOINT CASE MANAGEMENT PLAN

The parties agree that the Joint Case Management Plan may be altered or amended only upon a showing of good cause.

DATED this 13th day of June, 2011.

BY THE COURT:

s/John L. Kane

U.S. DISTRICT COURT JUDGE

APPROVED:

/s/ Alan M. Agee

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/s/ Michael S. Howard

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