

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLORADO  
Judge John L. Kane

Civil Action No. 12-cv-02719-AP

STACIE BEABER,  
Plaintiff,

v.

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

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JOINT CASE MANAGEMENT PLAN FOR SOCIAL SECURITY CASES

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1. APPEARANCES OF COUNSEL AND *PRO SE* PARTIES

For Plaintiff:

Chris R. Noel  
3000 Pearl Street, #212  
Boulder, Colorado 80301-2431  
303-449-6503  
[chrisildar@comcast.net](mailto:chrisildar@comcast.net)

For Defendant:

John F. Walsh  
United States Attorney

J. Benedict Garcia  
Assistant United States Attorney  
District of Colorado

S/Daniel Burrows  
Special Assistant United States Attorney  
Office of the General Counsel  
Social Security Administration  
1001 Seventeenth Street,  
Denver, Colorado 80202  
(303) 844-7356  
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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: October 12, 2012
- B. Date Complaint was served on U.S. Attorney's Office: October 16, 2012
- C. Date Answer and Administrative Record were filed: December 14, 2012

4. STATEMENT REGARDING THE ADEQUACY OF THE RECORD

Plaintiff states that the administrative record is presumed to be complete.

Defendant, to the best of his knowledge, states that the administrative record is complete and accurate.

5. STATEMENT REGARDING ADDITIONAL EVIDENCE

Plaintiff states that additional evidence may be required depending on what a review of the record reveals. See paragraph four above.

Defendant does not intend to submit additional evidence. In the event Plaintiff seeks to supplement the record, Defendant requests an opportunity to review the additional evidence and an opportunity to respond to Plaintiff's request to supplement the record.

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

Plaintiff states there are no unusual claims or defenses.

Defendant, to the best of his knowledge, does not believe the cases raises unusual claims or defenses.

7. OTHER MATTERS

The parties have no other matters to bring to the attention of the Court. This case is not on appeal from any other remanding court.

8. BRIEFING SCHEDULE

The parties respectfully request the following briefing schedule:

- |    |                                |                   |
|----|--------------------------------|-------------------|
| A. | Plaintiff's opening brief due  | February 25, 2013 |
| B. | Defendant's response brief due | March 25, 2013    |
| C. | Plaintiff's reply brief due    | April 3, 2013     |

9. STATEMENTS REGARDING ORAL ARGUMENT

- A. Plaintiff does not request oral argument.
- B. Defendant does not request oral argument.

10. CONSENT TO EXERCISE OF JURISDICTION BY MAGISTRATE JUDGE

All parties have not 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. 6.1(E) 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 20<sup>th</sup> day of December, 2012.

BY THE COURT:

*s/John L. Kane*  
U.S. DISTRICT COURT JUDGE

APPROVED:

s/Chris R. Noel  
Chris R. Noel  
3000 Pearl Street, #212  
Boulder, Colorado 80301-2431  
303-449-6503

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