

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

Civil Action No. 13-cv-00975-AP

BRETT CABRAL,

Plaintiff,

v.

CAROLYN COLVIN, Acting Commissioner of Social Security,

Defendant.

JOINT CASE MANAGEMENT PLAN FOR SOCIAL SECURITY CASES

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

For Defendant:

John F. Walsh
United States Attorney

J. Benedict Garcia
Assistant United States Attorney
District of Colorado

S/Alexess Rea
Special Assistant United States Attorney
Office of the General Counsel
Social Security Administration
1001 Seventeenth Street,
Denver, Colorado 80202
(303) 844-7101
Alexess.rea@ssa.gov

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:	April 17, 2013
B.	Date Complaint was served on U.S. Attorney's Office:	April 18, 2013
C.	Date Answer and Administrative Record were filed:	June 14, 2013

4. STATEMENT REGARDING THE ADEQUACY OF THE RECORD

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

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

5. STATEMENT REGARDING ADDITIONAL EVIDENCE

Plaintiff states that additional evidence is not required.

Defendant does not intend to submit additional evidence.

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 her knowledge, does 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. 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 | August 14, 2013 |
| B. | Defendant's response brief due | September 16, 2013 |
| C. | Plaintiff's reply brief due | September 30, 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 28th day of June, 2013.

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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