

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLORADO

Civil Action No. 14-cv-352-AP

Lily Grace Chaffee,

Plaintiff,

v.

Carolyn W. Colvin,
Acting Commissioner of Social Security,

Defendant.

JOINT CASE MANAGEMENT PLAN FOR SOCIAL SECURITY CASES

1. APPEARANCES OF COUNSEL AND *PRO SE* PARTIES

Pro se Plaintiff:
Lily Grace Chaffee
3636 Platte Drive
Ft. Collins, CO 80526
970-223-5383

For Defendant:
John F. Walsh
United States Attorney

J. Benedict García
Assistant United States Attorney
United States Attorney's Office
District of Colorado
J.B.Garcia@usdoj.gov

David I. Blower
Special Assistant United States Attorney
1961 Stout Street, Suite 4169
Denver, CO 80294-4003
303-844-1571
303-844-0770 (facsimile)
David.blower@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: 2/7/14

B. Date Complaint Was Served on U.S. Attorney's Office: 2/18/14

C. Date Answer and Administrative Record Were Filed: 4/17/14

4. STATEMENT REGARDING THE ADEQUACY OF THE RECORD

To the best of her knowledge, Plaintiff states that the record is complete and accurate.

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

5. STATEMENT REGARDING ADDITIONAL EVIDENCE

The parties do not anticipate submitting additional evidence.

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

The parties state that this case does not raise unusual claims or defenses.

7. OTHER MATTERS

The parties state that there are no other matters to bring to the attention of the Court. This case is not an appeal from a decision issued on remand from this Court.

8. BRIEFING SCHEDULE¹

- A. Plaintiff's Opening Brief Due: 7/16/14
- B. Defendant's Response Brief Due: 8/15/14
- C. Plaintiff's Reply Brief (If Any) Due: 9/1/14

Extension noted and approved/*JLK*

9. STATEMENTS REGARDING ORAL ARGUMENT

- A. Plaintiff's Statement: Plaintiff does not request oral argument.
- B. Defendant's Statement: Defendant does not request oral argument.

10. CONSENT TO EXERCISE OF JURISDICTION BY MAGISTRATE JUDGE

Indicate below the parties' consent choice.

- A. () All parties have consented to the exercise of jurisdiction of a United States Magistrate Judge.
- B. () All parties have not consented to the exercise of jurisdiction of a United States Magistrate Judge.

11. AMENDMENTS TO JOINT CASE MANAGEMENT PLAN

THE PARTIES FILING MOTIONS FOR EXTENSION OF TIME OR CONTINUANCES MUST COMPLY WITH D.C.COLO.LCivR 7.1(C) BY SUBMITTING PROOF THAT A COPY OF THE MOTION HAS BEEN SERVED UPON THE MOVING ATTORNEY'S CLIENT, ALL ATTORNEYS OF RECORD, AND ALL PRO SE PARTIES.

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

¹ The *pro se* Plaintiff requests that her briefing deadline be 70 days after the JCMP is filed, rather than 40. She is seeking to retain an attorney, but before the law firm will agree to represent her, it requested to review the administrative record. However, she received the administrative record only two weeks ago. This is the "extension request" referenced on the signature page, which agency counsel incorporated into the JCMP.

DATED this 7th day of May, 2014.

BY THE COURT:

s/John L. Kane

U.S. DISTRICT COURT JUDGE

APPROVED:

John F. Walsh
United States Attorney

s/
Lily Grace Chaffee²
3636 Platte Drive
Ft. Collins, CO 80526
970-223-5383

Pro se Plaintiff

By: s/ David I. Blower
David I. Blower
Special Assistant U.S. Attorney
1961 Stout Street, Suite 4169
Denver, CO 80294-4003
303-844-1571
303-844-0770 (facsimile)
David.blower@ssa.gov

Attorneys for Defendant

² The *pro se* Plaintiff's actual signature is on the scanned version of the JCMP, electronically filed with the Court.