

THE HONORABLE RONALD B. LEIGHTON

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

DALLAS HOAGLAND,

Plaintiff,

v.

SOCIAL SECURITY ADMINISTRATION,

Defendant.

No. C12-05750-RBL

STIPULATION AND ORDER

Come now Plaintiff Dallas Hoagland (“Ms. Hoagland”) and Defendant, the Social Security Administration (the “SSA” and collectively with Ms. Hoagland, the “Parties”), and respectfully state as follows:

On August 23, 2012, Plaintiff Dallas Hoagland filed a Motion with the Court seeking leave to pursue *in forma pauperis* her Complaint seeking relief from the SSA under the Freedom of Information Act, 5 U.S.C. § 552. Her Motion was later granted by the Court, and Ms. Hoagland then filed her Complaint and served it on the SSA.

1 On August 27, 2012, the Court issued its standard pre-trial order, requiring the Parties to
2 file by November 26, 2012, a joint-status report and discovery plan, addressing, *inter alia*, the
3 nature and complexity of the case, the appropriateness of ADR procedures, possible joinder of
4 additional parties, and the expected course of pre-trial discovery.

5 FOIA cases involve judicial review of administrative actions, and therefore are nearly
6 always resolved on motion for summary judgment based on declarations filed by the agency,
7 with no need for formal discovery. The Parties therefore agree that this case is appropriate to be
8 so resolved, and they respectfully request the Court to enter an Order providing as follows:
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10 Between November 26 and December 2, the Parties shall work in good faith to settle this
11 action, and to notify the Court of any agreement resolving this matter by December 9, 2012.

12 If they are unable to resolve this matter by December 2, 2012, the Parties agree to the
13 following briefing schedule:
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15 On December 23, 2012, the SSA will file a Motion for Summary Judgment.

16 On January 14, 2012, Ms. Hoagland will file her Response to the Motion.

17 On January 28, 2012, the SSA will file its Reply to Ms. Hoagland's Response to its
18 Motion.
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1 The SSA's Summary Judgment Motion shall be noted for January 28, 2012.

2 **SO STIPULATED THIS NOVEMBER 26, 2012**

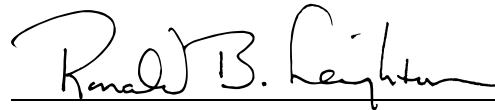
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11 **SO ORDERED**

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13 This 27th day of November, 2012.

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17 Ronald B. Leighton
18 United States District Judge