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**UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA**

ROBERTO ABALOS,)	CIVIL NO. 3:24-CV-04849-LJC
)	
Plaintiff,)	STIPULATION TO VOLUNTARY
)	REMAND PURSUANT TO 42 U.S.C.
vs.)	SECTION 405(g) SENTENCE FOUR
)	AND TO ENTRY OF JUDGMENT;
COMMISSIONER OF)	PROPOSED ORDER
SOCIAL SECURITY,)	
)	
Defendant.)	

The parties, acting through their respective counsel, hereby stipulate that the above-captioned case be reversed and remanded to the Commissioner of Social Security for another hearing. The Commissioner will direct the Administrative Law Judge to give further consideration to the opinion evidence and prior administrative medical findings and evaluate them in accordance with the regulations, and further evaluate the residual functional capacity consistent with the updated evaluation of the evidence. The ALJ shall take any necessary action to complete the administrative record and the

sequential evaluation, and issue a new decision. Plaintiff shall have the opportunity to submit new evidence.

The parties further ask the Court to specify in its order that the case is being remanded pursuant to sentence four of § 405(g), and to direct the Clerk to enter judgment in accordance with Fed. R. Civ. P. 58, consistent with the Supreme Court's decision in *Shalala v. Schaefer*, 509 U.S. 292, 296 302 (1993). The parties agree that reasonable attorney fees, expenses, and costs may be awarded under the Equal Access to Justice Act, 28 U.S.C. §§ 2412 and 1920, upon proper request to the Court.

Dated: December 16, 2024

By: /s/ Kevin LaPorte
KEVIN LaPORTE, ESQ
(as authorized by email)
Attorneys for Plaintiff


Dated: December 16, 2024

STEPHANIE HINDS
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MATHEW W. PILE
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Office of Program Litigation

By: /s/ Frederick Fripps
FREDERICK FRIPPS
Special Assistant U.S. Attorney
Attorneys for Defendant

IT IS SO ORDERED:

DATE: December 18, 2024


THE HONORABLE LISA J. CISNEROS
UNITED STATES MAGISTRATE JUDGE