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

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

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

3 The parties further ask the Court to specify in its order that the case is being remanded pursuant
4 to sentence four of § 405(g), and to direct the Clerk to enter judgment in accordance with Fed. R. Civ. P.
5 58, consistent with the Supreme Court's decision in *Shalala v. Schaefer*, 509 U.S. 292, 296 302
6 (1993). The parties agree that reasonable attorney fees, expenses, and costs may be awarded under the
7 Equal Access to Justice Act, 28 U.S.C. §§ 2412 and 1920, upon proper request to the Court.
8

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10 Dated: December 16, 2024

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

14 Dated: December 16, 2024

15 STEPHANIE HINDS
16 United States Attorney
17 MATHEW W. PILE
Associate General Counsel
Office of Program Litigation

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

22 IT IS SO ORDERED:
23

24 DATE: December 18, 2024
25 
26 THE HONORABLE LISA J. CISNEROS
27 UNITED STATES MAGISTRATE JUDGE
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