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5 Attorney for Jeffrey D. Moffatt, Pro-Per

6 **UNITED STATES DISTRICT COURT**
7 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
8

9 Social Security Administration,
10

11 Plaintiff

12 v.

13 Jeffrey Moffatt
14

15 Defendant
16

DISTRICT COURT DOCKET NO.:
2-18-cv-07752-VBF (DFM)

SSA DOCKET NO.: RS-17-03

**DEFENDANT'S MOTION FOR
WITHDRAWAL OF FORM G-123
AND MOTION TO STRIKE
FORM G-123 GERALYN ANNE
GULSETH, COUNSEL FOR NANCY
BERRYHILL**

Date: No date set

Courtroom:

Honorable Judge Valerie Baker Fairbank,
United States District Court Judge

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22 *COMES Now, Defendant Jeffrey D. Moffatt, who hereby submits this*
23 Motion for Withdrawal and Motion to Strike Document 18, pursuant to Federal
24 Rules of Civil Procedure Rule 12(f)(2), of GERALYN ANNE Gulseth, corresponding to
25 Form G-123, filed with this court on November 19, 2018, because Gulseth may not
26

1 convert Federal Public Moneys to provide legal defense funds and services for
2 Nancy Berryhill, who is “unconstitutionally seated as Acting Commissioner” of
3 Social Security Administration.
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6 **I. INTRODUCTION**

7 1. November 19, 2018, GERALYNN ANNE GULSETH submitted Form
8 G-123 Notice to be added in the above case as counsel for Plaintiff
9 Social Security Administration (SSA) and “[A]dding GERALYNN
10 ANNE GULSETH as counsel of record for Nancy Berryhill.”
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14 2. Unfortunately, Nancy Berryhill is past her Time Limits (Term
15 Limits), because Berryhill had been hired under Former President
16 Obama Administration and came into the position of Acting
17 Commissioner through a Presidential Memorandum by Former
18 President Obama, dated December 23, 2016.
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22 **II. FACTS**

23 **A. Background on Nancy Berryhill of Social Security
24 Administration**

25 3. March 6, 2018, according to the Government
26 Accountability Office (GAO), Nancy Berryhill “Pursuant to

1 section 3349(b) of title 5 of the United States Code, we are
2 reporting a violation of the Federal Vacancies Reform Act of
3 1998... (herein “the Vacancies Reform Act’ or ‘Act” or “Act”) at
4 the United States Social Security Administration with respect to
5 the Commissioner position. Specifically, we are reporting that the
6 service of Nancy A. Berryhill as Acting Commissioner at SSA
7 after November 17, 2017, is in violation of the Act.”...

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11 4. United States House Ways & Means Social Security
12 Administration Subcommittee Chairman Sam Johnson on July 28,
13 2018, said in pertinent part regarding Nancy Berryhill: “...SSA
14 should not proceed with plans to reinstate the reconsideration until
15 a Senate-confirmed Commissioner is sworn in place.”...

16 17 18 19 **III. MEMORANDUM POINTS OF AUTHORITY**

20 To benefit from the constitutional avoidance canon, Moffatt need not show
21 definitively that Plaintiff’s violations of Federal Vacancies Reform Act of 1998
22 would violate the Constitution. See *Clark v. Martinez*, 543 U.S. 371, 381 (2005)
23 (explaining that “[t]he canon is not a method of adjudicating constitutional
24 questions by other means,” but is instead to allow “courts to avoid the decision of
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26

1 constitutional questions”). Instead, it is enough to show that Plaintiff’s lack of
2 legal authority would raise serious constitutional questions, problems, or doubts,
3 *I.N.S. v. St. Cyr*, 533 U.S. 289, 300 (2001); *United States v. Hamilton*, 699 F.3d
4 356, 367-68 (5th Cir. 2012), and that Defendant’s reading is “plausible” or “fairly
5 possible,” *Milavetz, Gallop & Milovetz, P.A. v. United States*, 559 U.S. 229, 239
6 (2010) (quotation marks omitted); *Bartlett v. Strickland*, 556 U.S. 1, 21 (2009);
7 *Edward J. DeBartolo Corp. v. Fla. Gulf Coast Building & Constr. Trades Council*,
8 485 U.S. 568, 575 (1988).
9
10

11
12 Here both requirements are met. Plaintiff’s continued violation of the
13 Federal Vacancies Reform Act of 1998, 5 U.S.C. § 3345(a)(3); 5 U.S.C. §
14 3346(a)(1)(2); 5 U.S.C. § 3347(a) and 42 U.S.C. § 902(a)(1) raise serious
15 constitutional problems as to the legality of SSA’s November 30, 2017, action to
16 initiate and duplicate filing corporate entity reciprocal disciplinary “sui generis
17 criminal charges” against Defendant Moffatt in SSA Disciplinary Proceedings
18 Docket No.: RS-17-03, thirteen (13) days after November 17, 2017 when Berryhill
19 is in violation of Federal Vacancies Reform Act of 1998. The Plaintiff has not
20 provided documents to prove otherwise, the canon of constitutional avoidance thus
21 compels the court to side with Defendant Moffatt.
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1 Everything Berryhill does in this as Acting Commissioner, after 11/17/2017,
2 is *ultra vires*. See Noel Canning v. NLRB, 705 F.3d 490, 493 (D.C. Cir. 2013),
3 off'd, 134 S.Ct. 2550 (2014) (because President did not legitimately appoint
4 members to NLRB, Board did not have quorum and thus lacked authority to bind
5 the parties).
6

7 **QUESTIONS PRESENTED**

8 Whether Geralyn Anne Gulseth, is violating Title 18 U.S. Code § 641,
9 Federal Public Money by intentionally converting Federal Public Money for
10 personal gain by providing legal services through her representation of purported
11 Acting Commissioner Nancy Berryhill? See *Morissette v. United States*, 342 U.S.
12 246, 271 (1952). (holding that it is a defense to a charge of “knowingly converting”
13 federal property that one did not know that what one was doing was a
14 conversion)....
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19 Whether Geralyn Anne Gulseth is prohibited from providing legal services
20 and representation to Nancy Berryhill, who is illegally “unconstitutionally seated?”
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22 Whether Nancy Berryhill, needed authorization from Congress to approve
23 SSA Budgeted Federal Public Funds for her use in obtaining legal services and
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1 representation from GERALYN ANNE GULSETH, prior to Gulseth adding Notice of
2 Appearance onto this case through Form G-123?

3
4 **IV. ANALYSIS**

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6 In answering the first question, the Government Accountability Office
7 issued Findings against Nancy Berryhill that she was in violation of the Federal
8 Vacancy Reform Act. "Pursuant to section 3349(b) of Title 5 of the United States
9 Code, we are reporting a violation of the Federal Vacancies Reform Act of
10 1998."...Since Berryhill is violation of Federal Vacancies Reform Act, Gulseth,
11 may not conspire with Berryhill to provide legal defense services or use Public
12 Moneys while Berryhill is "unconstitutionally seated," and continuing to do so,
13 would result in a conversion of Federal Public Moneys.
14
15

16
17 GERALYN ANNE GULSETH, is violating Title 18 U.S. Code § 641, Federal Public
18 Money by intentionally converting Federal Public Money for personal gain
19 by providing legal services through representation of purported Acting
20 Commissioner Nancy Berryhill under **Connerly v. State Personnel Bd.**
21

22
23 Court of Appeal, Third District, California. September 04, 2001 92
24 Cal.App.4th 16

25 ...Code of Civil Procedure permits a taxpayer to bring an action to restrain or
26 prevent an illegal expenditure of; no showing of special damage to a

1 particular taxpayer is required as a requisite for bringing a taxpayer suit.
2 West's Ann.Cal.C.C.P. § 526a.... . Here Berryhill has been sitting illegally,
3 and in violation according to the GAO report. Moffatt need not show any
4 special damages, to challenge the violation. Moffatt therefore should be able
5 to have Gulseth removed as counsel from Berryhill for appearing to
6 represent her, for actions that took place after Berryhill was illegally sitting,
7 and arguably Berryhill's decision Gulseth is attempting to represent after
8 1117/17 void, and illegal. As such public expenditures for legal counsel to
9 protect from exposing the illegality would be intentionally converting public
10 money for the gain of Berryhill; Moffatt has standing under Connerly, to
11 challenge the conversion.
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16 When Golseth signed Form G-123 form stating she was representing
17 Berryhill individually, Golseth satisfied People v. Bradley, 208 Cal. App. 4th 64,
18 81-82, 145 Cal. Rptr. 3d 67, 85 (2012). A violation of the statute prohibiting
19 misappropriation of public funds is complete as soon as public money is willfully
20 misappropriated to the defendant's use or the use of another. West's
21 Ann.Cal.Penal Code § 424. The moment Gulseth went on the clock for Berryhill,
22 for a period of time when Berryhill was illegally sitting and unconstitutionally
23 sitting Gulseth was billing Federal Government illegally, and in violation of Bradley.
24 Federal Public Moneys may not be used for legal representation or legal defense
25
26

1 funds for who is illegally and “unconstitutionally seated.” Donahoe v. Arpaio, 986 F.
2 Supp. 2d 1091, 1112 (D. Ariz. 2013).

3 Also the balance of equities and public interest overwhelmingly favor
4 enjoining Berryhill from unlawfully exercising the authority of the Commissioner
5 of the SSA. *Winter v. Nat. Res. Def. Council, Inc.*, 555 U.S. 7, 20 (2008), as well
6 as would prohibit the use of Federal Funds to protect an illegal and void
7 directorship.
8

9
10 In answering the second question, unless Berryhill is footing the bill directly,
11 allowing inside counsel of SSA to personally represent an illegally sitting
12 Commissioner, whose decisions after 11/17/17 are void seems problematic.
13
14 Allowing SSA such a convenience would be a misuse of Federal Taxpayer money.
15

16 In answering the third question, deferral to the House Ways and means
17 notes, from July that indicated Berryhill lacked the capacity necessary for
18 decisions because she was not constitutionally sitting. If she lacked the capacity to
19 answer Congressional questions, it would seem equally likely that she would be
20 prohibited from hitting the tap for extra money to represent her illegal tenure.
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24 July 26, 2018, the United States House Ways and Means Social Security
25 Subcommittee, Chairman Sam Johnson (R-TX) and Subcommittee Ranking
26 Member John Larson (D-CT) led every Member of their Subcommittee in a letter

1 to Social Security Administration (SSA) Acting Commissioner Nancy Berryhill
2 stating "SSA should not proceed with plans to reinstate the reconsideration until a
3 Senate-confirmed Commissioner is sworn in place." See Defendant's **Exhibit A**

4 and **Source:**

5 https://waysandmeansforms.house.gov/uploadedfiles/cs_jl_ss_sc_to_across_recons
6 [ideration.pdf](https://waysandmeansforms.house.gov/uploadedfiles/cs_jl_ss_sc_to_across_recons)

7
8 Per SSA Budget Fiscal 2019 inclusive 2018 figures Appendix C Summary
9 of Key Management Officials Responsibilities, at Page 340...General Counsel
10 "(GC advises the COSS), ... and all subordinate organizational components
11 (except the Inspector General) on legal matters."...**Source:**

12 <https://www.ssa.gov/budget/FY19Files/2019CJ.pdf>

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14
15 Acronym of COSS to mean: "Commissioner of Social Security (COSS)
16 manages all agency programs and staff. Also serves as the Chief Operating Officer,
17 responsible for improving agency management and performance."... And (GC
18 advises the COSS,..) does not mean to provide legal services and representation,
19 with the use of Federal Public Moneys unless approved by Congress.
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23 According to SSA's own budget content General Counsel "(GC advises the
24 COSS),"...and within SSA's own budget it does not contain authorization
25 language for General Counsel (GC's) to provide legal defense or legal services
26

1 representation for holdover employee Acting Commissioner Nancy Berryhill,
2 who's actions are Counter to DOJ's, and if NLRB is followed makes all Berryhill's
3 actions void and ultra vires, under NLRB, infra. *Paying for direct counsel for an*
4 *illegal director, Berryhill, without Congressional approval when Berryhill was not*
5 *unlawfully exercising the authority of the Commissioner of the SSA would be a*
6 *prohibited use of Federal Funds. Winter v. Nat. Res. Def. Council, Inc., 555 U.S.*
7 *7, 20 (2008).*
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9

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11 **V. CONCLUSION**

12 **WHEREFORE DEFENDANT** requests the Court grant the removal of
13 Form G-123 as a Motion for Withdrawal of GERALD ANNE GULSETH and to Motion
14 to Strike Form G-123 both pursuant to Federal Rules of Civil Procedure Rule
15 12(f)(2), because Congress has not approved within Social Security Administration
16 Budget that Federal Public Moneys may be used for legal representation or legal
17 defense funds for purported Acting Commissioner Nancy Berryhill, who is
18 illegally and "unconstitutionally seated."
19

20
21 DATED: November 29, 2018, Thursday
22

23
24 */s/ Jeffrey D. Moffatt*
25 By: Jeffrey D. Moffatt,
26 Defendant-Federal Attorney Pro-Se

KEVIN BRADY, TEXAS,
CHAIRMAN

SAM JOHNSON, TEXAS
DEWEN RUIZES, CALIFORNIA
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BRAD R. VENSTRUP, OHIO

GAISY J. ANDRES,
STAFF DIRECTOR

Congress of the United States

U.S. House of Representatives

COMMITTEE ON WAYS AND MEANS

1102 LONGWORTH HOUSE OFFICE BUILDING
(202) 225-3625

Washington, DC 20515-6518

<http://waysandmeans.house.gov>

RICHARD E. NEAL, MASSACHUSETTS, RANKING MEMBER
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BRANDON CASEY,
MINORITY CHIEF OF STAFF

July 26, 2018

Nancy A. Berryhill
Acting Commissioner
Social Security Administration
6401 Security Boulevard
Baltimore, MD 21207

Dear Acting Commissioner Berryhill:

We are writing to follow up on yesterday's Social Security Subcommittee hearing to make clear that the Social Security Administration (SSA) should not proceed with any plans to reinstate reconsideration until a Senate-confirmed Commissioner is in place. Reinstating reconsideration nationwide is a big decision and should only be made by a Senate-confirmed Commissioner.

At the hearing, Members on a bipartisan basis raised serious questions about the decision to reinstate reconsideration at this time. While we agree that Social Security needs a consistent, nationwide appeals process, there is little evidence to show that reconsideration is a meaningful step in the disability appeals process. There is no sense in seeking a nationally-uniform process if the process itself is flawed. Additionally, while reinstating reconsideration will allow some people to be awarded benefits sooner, the vast majority of people ultimately approved for benefits will just have longer wait times. The average wait for a hearing with an Administrative Law Judge is already nearly 600 days. Adding another 100 days by reinstating reconsideration in its current form is simply wrong.

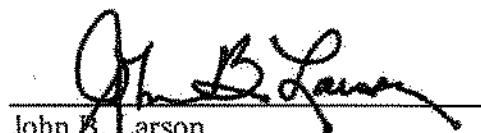
Instead of reinstating reconsideration, the SSA should dedicate its efforts to identifying effective, evidence-based changes that would improve the timeliness and accuracy of disability determinations. We also expect that any significant changes to the adjudication process be made on the basis of solid data and evidence, presented to Congress, which demonstrates that the changes would result in the correct decision – an award of benefits if the individual meets the statutory eligibility criteria – being made earlier in the adjudication process.

We look forward to receiving your response no later than August 3, 2018. Should you or your staff have any questions, please contact Amy Shuart, the Social Security Subcommittee Majority Staff Director, at (202) 225-9263, and Kathryn Olson, the Social Security Subcommittee Minority Staff Director, at (202) 225-4021.

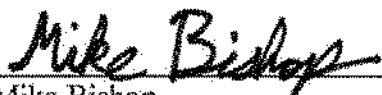
Sincerely,



Sam Johnson
Chairman
Subcommittee on Social Security



John B. Larson
Ranking Member
Subcommittee on Social Security



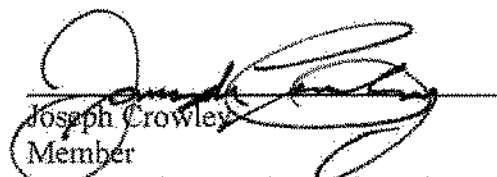
Mike Bishop
Member
Subcommittee on Social Security



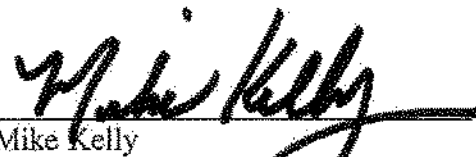
Bill Pascrell, Jr.
Member
Subcommittee on Social Security



Vern Buchanan
Member
Subcommittee on Social Security



Joseph Crowley
Member
Subcommittee on Social Security



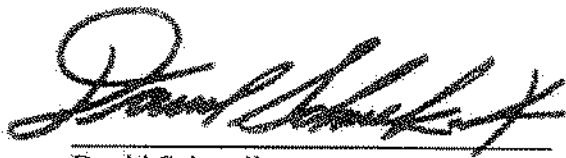
Mike Kelly
Member
Subcommittee on Social Security



Linda T. Sanchez
Member
Subcommittee on Social Security



Tom Rice
Member
Subcommittee on Social Security



David Schweikert
Member
Subcommittee on Social Security



Darin LaHood
Member
Subcommittee on Social Security

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5 Attorney for Jeffrey D. Moffatt, Pro-Per

6 **UNITED STATES DISTRICT COURT**
7 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
8

9 Social Security Administration,

10 Plaintiff

11 v.

12 Jeffrey Moffatt,

13 Defendant.
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DISTRICT COURT DOCKET NO.:
2-18-cv-07752-VBF (DFM)

SSA DOCKET NO.: RS-17-03

**DEFENDANT MOFFATT'S NOTICE
OF MOTION AND MOTION TO
STRIKE FORM G-123 BY GERALYN
ANNE GULSETH, COUNSEL FOR
NANCY BERRYHIL PURSUANT TO
FED. R. CIV. P. RULE 12(f)(2),
MEMORANDUM OF POINTS AND
AUTHORITIES, DECLARATION OF
JEFFREY D. MOFFATT IN
SUPPORT**

Date: No date set

Courtroom:

Honorable Judge Valerie Baker Fairbank
United States District Court Judge

23
24 TO THE COURT, ALL PARTIES AND THEIR COUNSEL OF RECORD:

25 **NOTICE IS HEREBY GIVEN** that Defendant Jeffrey D. Moffatt
26

1 (Moffatt) is filing a Motion for Withdrawal of Form G-123 and Motion to Strike
2 entire Social Security Administration's Pleadings in Document 18 and its
3 attachments including Form G-123 by GERALYN ANNE GULSETH, pursuant to Fed. R.
4 Civ. P. Rule 12(f)(2), Memorandum of Points and Authorities, and Declaration of
5 Jeffrey D. Moffatt in support.
6

7
8 This motion is based on this Notice, the attached Motion for Withdrawal of
9 Form G-123 and Motion to Strike entire Social Security Administration's
10 Pleadings in Document 18 and pursuant to Fed. R. Civ. P. Rule 12(f)(2),
11 Memorandum of Points and Authorities, Declaration of Jeffrey D. Moffatt in
12 support, exhibits filed concurrently, the records and pleading on file herein; and on
13 such other evidence as may be presented before the Court at the time of the hearing
14 on the motion.
15
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18
19 **Dated:** November 28, 2018, ⁹ ~~Wednesday~~ ^{Thursday}

20
21 /s/ Jeffrey D. Moffatt
22 By: Jeffrey D. Moffatt,
23 Defendant-Federal Attorney Pro-Se
24
25
26

1 Jeffrey D. Moffatt, SSA Federal Attorney
2 332 W. Ave S, Suite D
3 Palmdale, CA 93551
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6 E-Mail: jeffreymbajd@hotmail.com
7 Other email address: Jeffrey@jeffmoffattlawfirm.com

8 Attorney for Jeffrey D. Moffatt, Pro-Per

9 **UNITED STATES DISTRICT COURT**
10 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

11 Social Security Administration,
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13 Plaintiff

14 v.

15 Jeffrey Moffatt,
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17 Defendant.

**DISTRICT COURT DOCKET NO.: 2-
18-cv-07752-VBF (DFM)**

SSA DOCKET NO.: RS-17-03

**DECLARATION OF JEFFREY D.
MOFFATT IN SUPPORT OF
DEFENDANT MOFFATT'S MOTION
TO STRIKE FORM G-123 AND
ATTACHMENTS BY GERALYN A.
GULSETH IN DOCUMENT 18
PURSUANT TO FED. R. CIV. P.
RULE 12(f)(2) AND MEMORANDUM
OF POINTS AND AUTHORITIES**

Date: No date set

Courtroom:

Honorable Judge Valerie Baker Fairbank
United States District Court Judge

18 **DECLARATION OF JEFFREY D. MOFFATT**

19 I, Jeffrey D. Moffatt, am over 18 years old, and having first-hand knowledge
20 by my signature below that the following facts are true, correct and complete to the
21 best of my knowledge and belief:

1 1. On November 19, 2018, Plaintiff's filed Form G-123 with attachments
2 See CM/ECF Document ("Doc") 18.

3 2. In reviewing Form G-123, filed with the Court I found that GERALYN A.
4 Gulseth, stated she was also counsel for Nancy Berryhill, Acting Commissioner of
5 the Social Security Administration.
6

7 3. In fact gathering and research it is impossible for Gulseth to provide legal
8 services to Nancy Berryhill, because the Government Accountability Office
9 (GAO) Berryhill is past her Time Limit (Term Limit) for Acting Commissioner
10 and per Defendant's Exhibit A within this motion Congress of the United States-
11 U.S. House of Representatives, letter to Berryhill dated July 26, 2018, stated in
12 pertinent part: "[w]e are writing to follow up on yesterday's Social Security
13 Subcommittee hearing to make clear that *Social Security (SSA) should not*
14 *proceed* with any plans to reinstate reconsideration *until a Senate-confirmed*
15 *Commissioner is in place.*"
16
17
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19 4. Exhibit A was located by me doing research online with the Congress of
20 the United States – U.S. House of Representatives on matters related to Social
21 Security Administration.
22

23 5. I had also done other research regarding Social Security Administration
24 related to their annual budgets and GAO's reports regarding Nancy Berryhill.
25
26

1 I, Jeffrey D. Moffatt, do swear under oath, that the above information is true
2 and correct and if called to testify would do so, before this court of law.

3 **Dated:** November 28, 2018, Wednesday

4
5 /s/ Jeffrey D. Moffatt
6 By: Jeffrey D. Moffatt,
7 Defendant-Federal Attorney Pro-Se
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11 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

12 Social Security Administration,

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**DISTRICT COURT DOCKET NO.: 2-
18-cv-07752-VBF (DFM)**

SSA DOCKET NO.: RS-17-03

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MOFFATT IN SUPPORT OF
DEFENDANT MOFFATT'S MOTION
TO STRIKE FORM G-123 AND
ATTACHMENTS BY GERALYN A.
GULSETH IN DOCUMENT 18
PURSUANT TO FED. R. CIV. P.
RULE 12(f)(2) AND MEMORANDUM
OF POINTS AND AUTHORITIES**

Date: No date set

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Honorable Judge Valerie Baker Fairbank
United States District Court Judge

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2 and correct and if called to testify would do so, before this court of law.

3 **Dated:** November 28⁹, 2018, ~~Wednesday~~ ^{Thursday}
4

5 /s/ Jeffrey D. Moffatt
6 By: Jeffrey D. Moffatt,
7 Defendant-Federal Attorney Pro-Se
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1 Jeffrey D. Moffatt, SSA Federal Attorney
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5 Facsimile: (661) 945-3019
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7 Other email address: Jeffrey@jeffmoffattlawfirm.com

8 Attorney for Jeffrey D. Moffatt, Pro-Per

9
10 **UNITED STATES DISTRICT COURT**
11
12 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
13

14 Social Security Administration,
15
16 Plaintiff
17
18 v.
19
20 Jeffrey Moffatt
21
22 Defendant

DISTRICT COURT DOCKET NO.: 2-18-cv-07752-VBF (DFMx)

SSA DOCKET NO.: RS-17-03

[PROPOSED] ORDER GRANTING DEFENDANT'S MOTION FOR WITHDRAWAL OF FORM G-123 AND MOTION TO STRIKE FORM G-123 BY GERALYN ANNE GULSETH, COUNSEL FOR NANCY BERRYHILL

Date:
Time:
Courtroom:

Honorable Judge Valerie Baker Fairbank

23 **ORDER** granting Defendant's Motion for Withdrawal of Form G-123
24 AND Motion to Strike Form G-123 by GERALYN ANNE GULSETH, Counsel for Nancy
25 Berryhill and counsel for Social Security Administration.
26

1 This Matter, having come before the Court on Defendant's Motion for
2 Withdrawal of Form G-123 Geralyn Anne Gulseth, Counsel for Nancy Berryhill,
3 should be granted.
4

5
6 This Matter, having come before the Court on Defendant's Motion to Strike
7 Form G-123 by Geralyn Anne Gulseth, Counsel for Nancy Berryhill and counsel
8 for Social Security Administration, should be granted.
9

10
11 **IT IS HEREBY ORDERED** that Defendant's Motion for Withdrawal of Form
12 G-123 by Geralyn Anne Gulseth, Counsel for Nancy Berryhill is granted.
13

14
15 **IT IS HEREBY ORDERED** that Defendant's Motion to Strike Form G-123 by
16 Geralyn Anne Gulseth, is stricken entirely from the Court's docket and granted.
17

18
19 Dated: _____, 2018
20

21
22 _____
23 Senior Judge Valerie Fairbank,
24 United States Court District Judge
25
26

Responses, Replies and Other Motion Related Documents

2:18-cv-07752-VBF-DFM Social Security
Administration v. Jeffrey Moffatt

(DFMx),DISCOVERY,MANADR,RELATED-
G,STAYED

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF CALIFORNIA

Notice of Electronic Filing

The following transaction was entered on 11/29/2018 at 12:34 PM PST and filed on 11/29/2018

Case Name: Social Security Administration v. Jeffrey Moffatt
Case Number: 2:18-cv-07752-VBF-DFM
Filer: Jeffrey D Moffatt
Document Number: 22

Docket Text:

DEFENDANTS MOTION FOR WITHDRAWAL OF FORM G-123 AND MOTION TO STRIKE FORM G-123 GERALYN ANNE GULSETH, COUNSEL FOR NANCY BERRYHILL re NOTICE OF MOTION AND MOTION to Lift Stay NOTICE OF MOTION AND MOTION to Remand Case to Social Security Administration [12] filed by Defendant Jeffrey D Moffatt. (Attachments: # (1) Notice of Motion, # (2) Dec, # (3) Proposed order, # (4) cert)(Moffatt, Jeffrey)

2:18-cv-07752-VBF-DFM Notice has been electronically mailed to:

Deborah Stachel deborah.stachel@ssa.gov

Geralyn A Gulseth geralyn.gulseth@ssa.gov, CaseView.ECF@usdoj.gov,
usacac.ssfilings@usdoj.gov

Jeffrey D Moffatt jeffreymbajd@hotmail.com

Jennifer Lee Tarn Jennifer.Tarn@ssa.gov, CaseView.ECF@usdoj.gov

**2:18-cv-07752-VBF-DFM Notice has been delivered by First Class U. S. Mail or by other means
BY THE FILER to :**

The following document(s) are associated with this transaction:

Document description:Main Document

Original filename:C:\fakepath\12-29-18 Motion .pdf

Electronic document Stamp:

[STAMP caedStamp_ID=1020290914 [Date=11/29/2018] [FileNumber=26689852-0] [2bdec3da96ccad60df7c04ca260a484413acba92d6d610a9521bcbfe0d32d538c760439f8b8c9173ab8332ec5d7970975be3a5f4cb04c4976338df40de14778b]]

Document description: Notice of Motion

Original filename:C:\fakepath\11-29-18 Notice of Motion.pdf

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Case Scanning
Notion Law Firm

11/29/18

[STAMP cacdStamp_ID=1020290914 [Date=11/29/2018] [FileNumber=26689852-1] [a17e2d3b90986db1f00d29411000eccc9c122516e413f78e7615afc7c49d9901ff0f084952f6a112980de8ea5bf71b39d671b6c5d181d7b31478bc1c45a40bcce]]

Document description: Dec

Original filename:C:\fakepath\11-29-18 Dec.pdf

Electronic document Stamp:

[STAMP cacdStamp_ID=1020290914 [Date=11/29/2018] [FileNumber=26689852-2] [5ace81de3d69b5c52d8148b193104b9b5e5fe78f0541badb3fc88c05f63e2f3360c18bdc5e30086b888d1892d73c2ec62e63e593b665207a23774e81fe23a98e]]

Document description: Proposed order

Original filename:C:\fakepath\11-29-18 Proposed order.pdf< BR>**Electronic document Stamp:**

[STAMP cacdStamp_ID=1020290914 [Date=11/29/2018] [FileNumber=26689852-3] [5e158e75014e2b364d9b9e7cd86d063cb96ff307d185ac4679fa3bed317231191aea33d8398388cc13a00c43b215af11ccf7a44e6685f3c80e62104c250f0154]]

Document description: cert

Original filename:C:\fakepath\CERTIFICATE OF SERVICE FOR ELECTRONIC FILING ONLY.pdf

Electronic document Stamp:

[STAMP cacdStamp_ID=1020290914 [Date=11/29/2018] [FileNumber=26689852-4] [21af5bb7f9c6d7c75e2dbcad7adfdb62dd27d1a1c6946bc544a9b4b4222397cabe84078105a41da1cbbf4ae24f99d8e5859faeaf4d55683d1779638e18a32012]]