

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ARIZONA

Regina Mae McCoy v. Commissioner of Social Security
Administration

McCoy · No. CV-25-02060-PHX-SPL · Decided April 10, 2026

SUMMARY

The United States District Court for the District of Arizona adopted a magistrate judge’s Report and Recommendation because no party filed objections. The court reversed the Commissioner of Social Security’s decision and remanded for further proceedings, while dismissing without prejudice the plaintiff’s requests for Medicare reinstatement and removal of an overpayment.

CASE DETAILS

COURT	United States District Court for the District of Arizona
JURISDICTION	United States District Court for the District of Arizona
DECIDED	April 10, 2026
DOCKET	CV-25-02060-PHX-SPL
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review of the denial of her application for disability insurance benefits. A magistrate judge recommended reversing the Administrative Law Judge’s decision and remanding for further proceedings. After the parties failed to object, the district court adopted the Report and Recommendation, reversed the Commissioner’s decision, remanded for further proceedings, and dismissed without prejudice Plaintiff’s requests for Medicare reinstatement and removal of an overpayment.
STANDARD OF REVIEW	When no party objects to a magistrate judge’s report and recommendation, the district court is not required to conduct de novo or other review of the magistrate judge’s factual or legal conclusions. The court nevertheless reviewed the R&R and found it well-taken.
PRECEDENTIAL VALUE	Unpublished district court order
PARTIES	Regina Mae McCoy v. Commissioner of Social Security Administration

TOPICS

judicial review of agency action

administrative law

civil procedure

remedies

PRACTICE AREAS

Social Security

administrative law

civil procedure

QUESTIONS PRESENTED

1. Whether the district court was required to review the magistrate judge's Report and Recommendation when neither party filed objections.
2. Whether the Administrative Law Judge's decision denying disability insurance benefits should be reversed and remanded for further proceedings.
3. Whether Plaintiff's requests for reinstatement of Medicare and removal of an overpayment should be dismissed without prejudice.

HOLDINGS

1. When no party objects to a magistrate judge's Report and Recommendation within the prescribed period, the district court is relieved of its obligation to review the magistrate judge's factual and legal conclusions.
2. The Commissioner's final decision is reversed and the matter is remanded for further proceedings.
3. Plaintiff's requests for reinstatement of Medicare and removal of an overpayment are dismissed without prejudice.

KEY QUOTATIONS

"It does not appear that Congress intended to require district court review of a magistrate's factual or legal conclusions, under a de novo or any other standard, when neither party objects to those findings." (at 1)

"[N]o review is required of a magistrate judge's report and recommendation unless objections are filed." (at 1)

FACTUAL BACKGROUND

Plaintiff applied for disability insurance benefits, but the Commissioner denied the application following an Administrative Law Judge's decision. Plaintiff challenged that decision in federal district court. The magistrate judge recommended reversal and remand for further proceedings; the opinion does not provide additional substantive facts concerning Plaintiff's disability claim.

PROCEDURAL HISTORY

Regina Mae McCoy filed a complaint challenging the denial of disability insurance benefits. Magistrate Judge John Z. Boyle issued a Report and Recommendation recommending reversal of the Administrative Law Judge's decision and remand. Neither party filed objections within the prescribed fourteen-day period, and the district court adopted the R&R and entered judgment accordingly.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Commissioner must conduct further proceedings consistent with the adopted Report and Recommendation. Plaintiff's requests for reinstatement of Medicare and removal of an overpayment were dismissed without prejudice.

CASES CITED

- U.S. v. Reyna-Tapia, 328 F.3d 1114, 1121 (9th Cir. 2003)
- Thomas v. Arn, 474 U.S. 140, 149–50 (1985)
- Schmidt v. Johnstone, 263 F. Supp. 2d 1219, 1226 (D. Ariz. 2003)

OPINION

McCoy

PER CURIAM.

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6 IN THE UNITED STATES DISTRICT COURT

7 FOR THE DISTRICT OF ARIZONA

8 Regina Mae McCoy,) No. CV-25-02060-PHX-SPL) 9) 10 Plaintiff,) ORDER vs.)) 11)
Commissioner of Social Security) 12 Administration,)) 13) 14 Defendant.) 15 Plaintiff filed a
Complaint (Doc. 1), challenging the denial of her application for 16 disability insurance benefits.
The Honorable John Z. Boyle, United States Magistrate 17 Judge, issued a Report and
Recommendation (“R&R”) (Doc. 23), recommending that the 18 Court reverse the Administrative
Law Judge’s decision and remand for further 19 proceedings. Judge Boyle advised the parties that
they had fourteen (14) days to file 20 objections to the R&R and that failure to do so could be
considered a waiver of the right to 21 review (Doc. 23 at 9–10) (citing 28 U.S.C. § 636(b)(1), U.S.
v. Reyna-Tapia, 328 F.3d 22 1114, 1121 (9th Cir. 2003)). 23 The parties have not filed objections
and the time to do so has expired, relieving the 24 Court of its obligation to review the R&R. See,
e.g., Thomas v. Arn, 474 U.S. 140, 149–50 25 (1985) (“It does not appear that Congress intended
to require district court review of a 26 magistrate’s factual or legal conclusions, under a de novo or
any other standard, when 27 neither party objects to those findings.”); Schmidt v. Johnstone, 263
F. Supp. 2d 1219, 1226 28 (D. Ariz. 2003) (“[N]o review is required of a magistrate judge’s report
and 1 | recommendation unless objections are filed.”); see also Reyna-Tapia, 328 F.3d at 1121 2 | (€
[T]he district judge must review the magistrate judge’s findings and recommendations novo
if objection is made, but not otherwise.”). The Court has nonetheless reviewed the 4 | R&R and
finds that it is well-taken. The Court will thus adopt the R&R. 5 IT IS THEREFORE ORDERED
that Magistrate Judge Boyle’s Report and 6 | Recommendation (Doc. 23) is accepted and adopted

by the Court. 7 IT IS FURTHER ORDERED that the final decision of the Commissioner of the 8 | Social Security Administration is reversed and remanded for further proceedings. 9 IT IS FURTHER ORDERED that Plaintiffs request for reinstatement of 10 | Medicare and removal of overpayment is dismissed without prejudice. 11 IT IS FURTHER ORDERED directing the Clerk of Court to enter judgment accordingly and terminate this case. 13 Dated this 10th day of April, 2026. 14 16 United States District Judge 17 18 19 20 21 22 23 24 25 26 27 28