

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
ILLINOIS

Donna Shatzsall v. Frank Bisignano, Commissioner of Social Security

Shatzsall · No. 25-cv-01360-SPM · Decided February 26, 2026

SUMMARY

The United States District Court for the Southern District of Illinois granted the parties’ joint motion for a sentence-four remand under 42 U.S.C. § 405(g) in a Social Security disability benefits case. The court reversed the Commissioner’s decision, directed rehearing and reconsideration of the evidence, ordered judgment in favor of the plaintiff, and closed the case.

CASE DETAILS

COURT	United States District Court for the Southern District of Illinois
WRITING FOR THE COURT	Stephen P. McGlynn
JURISDICTION	United States District Court for the Southern District of Illinois
DECIDED	February 26, 2026
DOCKET	25-cv-01360-SPM
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	The parties jointly moved for a sentence-four remand under 42 U.S.C. § 405(g) of the Commissioner's final decision denying Social Security Disability and Supplemental Security Income benefits.
STANDARD OF REVIEW	A sentence-four remand under 42 U.S.C. § 405(g) requires a finding of error in the Commissioner's decision.
PRECEDENTIAL VALUE	Unpublished district court memorandum and order; nonprecedential.
PARTIES	Donna Shatzsall v. Frank Bisignano, Commissioner of Social Security

TOPICS

- judicial review of agency action
- administrative law
- remedies
- civil procedure

PRACTICE AREAS

- Social Security
- administrative law
- civil procedure
- judicial review

QUESTIONS PRESENTED

1. Whether the parties' joint motion for a sentence-four remand under 42 U.S.C. § 405(g) should be granted.
2. What proceedings and reconsideration the Commissioner should undertake on remand.

HOLDINGS

1. A sentence-four remand under 42 U.S.C. § 405(g) was appropriate because the remand was based on error in the Commissioner's decision; the court therefore granted the parties' joint motion.
2. Upon a sentence-four remand, judgment should be entered in favor of the plaintiff.

KEY QUOTATIONS

“A sentence four remand (as opposed to a sentence six remand) depends upon a finding of error, and is itself a final, appealable order.” (Memorandum and Order)

“Upon a sentence four remand, judgment should be entered in favor of the plaintiff.” (Memorandum and Order)

FACTUAL BACKGROUND

Donna Shatzsall applied for Social Security Disability and Supplemental Security Income benefits. An ALJ denied the application, and the Social Security Administration's Appeals Council upheld the denial. The parties agreed that the Appeals Council would vacate the ALJ's findings and remand the matter for further consideration of medical opinions, residual functional capacity findings, and, if warranted, additional vocational-expert testimony.

PROCEDURAL HISTORY

Plaintiff applied for benefits on March 17, 2022. An ALJ issued an unfavorable decision on June 4, 2024, and the Appeals Council upheld that decision in an order sent on May 14, 2025. The parties then jointly sought remand, and the district court granted the motion, reversed the Commissioner's decision, ordered a sentence-four remand, directed entry of judgment for Plaintiff, and closed the case.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Appeals Council is to vacate all findings in the ALJ's decision and remand the matter to an ALJ. On remand, the ALJ should evaluate the medical opinions and residual functional capacity findings; obtain additional vocational-expert testimony if warranted; take any further action needed to complete the administrative record and resolve those issues; offer Plaintiff an opportunity for a hearing; and issue a new decision.

CASES CITED

- *Perlman v. Swiss Bank Corp. Comprehensive Disability Protection Plan*, 195 F.3d 975, 978 (7th Cir. 1999)

- *Shalala v. Schaefer*, 509 U.S. 292, 302–03 (1993)

OPINION

Shatzsall

PER CURIAM.

IN THE UNITED STATES DISTRICT COURT

FOR THE SOUTHERN DISTRICT OF ILLINOIS

DONNA SHATZSALL,

Plaintiff, v. Case No. 25-cv-01360-SPM

FRANK BISIGNANO,

Commissioner of Social Security, Defendant.

MEMORANDUM AND ORDER

McGLYNN, District Judge: Before the Court is the parties' Joint Motion to Remand to the Commissioner of Social Security under sentence four of 42 U.S.C. § 405(g). (Doc. 21). A sentence four remand (as opposed to a sentence six remand) depends upon a finding of error, and is itself a final, appealable order. See *Perlman v. Swiss Bank Corp. Comprehensive Disability Prot. Plan*, 195 F.3d 975, 978 (7th Cir. 1999). Upon a sentence four remand, judgment should be entered in favor of the plaintiff. *Shalala v. Schaefer*, 509 U.S. 292, 302–03 (1993). The parties agree that, upon remand, the Appeals Council will vacate all findings in the Administrative Law Judge's ("ALJ") decision and remand the matter to an ALJ. On remand, the ALJ should evaluate any medical opinions and the RFC findings; if warranted, obtain additional vocational expert testimony; take any further action needed to complete the administrative record resolving the afore-mentioned issues; offer Plaintiff Shatzsall the opportunity for a hearing; and issue a new decision. Plaintiff applied for Social Security Disability and Supplemental Security Income benefits on March 17, 2022, and received an unfavorable decision from ALJ Marcus Johns on June 4, 2024 (Doc. 1). Plaintiff filed a timely Request for Review with the Social Security Administration's Appeals Council, which upheld the ALJ's decision in an order sent to Plaintiff on May 14, 2025 (Doc. 1). Although recognizing that the agency has a full docket, the Court urges the Commissioner to expedite this case on remand. Therefore, for good cause shown, the parties' Joint Motion to Remand (Doc. 21) is GRANTED. The final decision of the Commissioner of Social Security denying Plaintiff's application for Social Security Disability and Supplemental Security Income benefits is REVERSED and REMANDED to the Commissioner for rehearing and reconsideration of the evidence, pursuant to sentence four of 42 U.S.C. § 405(g). The Clerk of Court is DIRECTED to enter judgment in favor of Plaintiff and to close this case on the Court's docket. IT IS SO ORDERED. DATED: February 26, 2026 s/ Stephen P. McGlynn

STEPHEN P. McGLYNN

U.S. District Judge

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