

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PRECEDENTIAL VALUE	Unpublished district court memorandum and order; nonprecedential.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)

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