

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ARIZONA

**Raymond Bachmann v. Commissioner of Social Security
Administration**

Bachmann · No. CV-25-00087-TUC-RCC · Decided March 5, 2026

SUMMARY

The United States District Court for the District of Arizona adopted a magistrate judge’s Report and Recommendation after no objections were filed. The court reversed the Commissioner of Social Security’s final decision and remanded the matter for further proceedings, including reanalysis and rehearing.

CASE DETAILS

COURT	United States District Court for the District of Arizona
WRITING FOR THE COURT	Raner C. Collins
JURISDICTION	United States District Court for the District of Arizona
DECIDED	March 5, 2026
DOCKET	CV-25-00087-TUC-RCC
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought district-court review of the Commissioner's final Social Security decision. A magistrate judge issued a Report and Recommendation recommending reversal and remand. The district court adopted the R&R and reversed and remanded the Commissioner's decision after no party filed objections.
STANDARD OF REVIEW	When neither party objects to a magistrate judge's report and recommendation, the district court is not required to review the recommendation under any specified standard of review, although the governing statute permits sua sponte or party-requested review under a de novo or other standard.
PRECEDENTIAL VALUE	Nonprecedential district court order; precedential status is not specified in the opinion.
PARTIES	Raymond Bachmann v. Commissioner of Social Security Administration

TOPICS

judicial review of agency action

administrative law

civil procedure

PRACTICE AREAS

Social Security

administrative law

civil procedure

QUESTIONS PRESENTED

1. What standard of review applies when neither party objects to a magistrate judge's Report and Recommendation?
2. Whether the district court should adopt the magistrate judge's recommendation to reverse and remand the Commissioner's final decision.

HOLDINGS

1. When neither party objects to a magistrate judge's Report and Recommendation, the district court is not required to review the recommendation under any specified standard of review, though it may conduct further review sua sponte or at a party's request under a de novo or other standard.
2. The Report and Recommendation was adopted, and the Commissioner's final decision was reversed and remanded for further proceedings consistent with the magistrate judge's recommendation.

KEY QUOTATIONS

“does not preclude further review by the district judge, sua sponte or at the request of a party, under a de novo or any other standard.” (at 1)

FACTUAL BACKGROUND

Raymond Bachmann sought judicial review of a final decision by the Commissioner of Social Security. The magistrate judge recommended reversal and remand for reanalysis and rehearing. No party objected to the recommendation within the prescribed period.

PROCEDURAL HISTORY

On February 18, 2026, Magistrate Judge Eric J. Markovich recommended reversing the Commissioner's final decision and remanding for reanalysis and rehearing. The parties were given until February 27, 2026, to object, but no objections were filed. The district court reviewed the complaint, briefing, and R&R, adopted the R&R, and ordered reversal and remand.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Commissioner must conduct further proceedings in accordance with Magistrate Judge Markovich's Report and Recommendation, including the recommended reanalysis and rehearing.

CASES CITED

- Thomas v. Arn, 474 U.S. 140, 150, 154 (1985)

OPINION

IN THE UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ARIZONA Raymond Bachmann, No. CV-25-00087-TUC-RCC Plaintiff, ORDER v. 12 Commissioner of Social Security Administration, 13 Defendant. 14 15 On February 18, 2026, Magistrate Judge Eric J. Markovich issued a Report and 16 Recommendation (“R&R”) in which he recommended the Court enter an order reversing 17 the final decision by the Commissioner of Social Security and remanding the case to the 18 Commissioner for reanalysis and rehearing.

(Doc. 22.) The R&R notified the parties they 19 had until February 27, 2026 to file any objections. The time has passed, and no objections 20 have been filed. 21 If neither party objects to a magistrate judge’s report and recommendation, the 22 District Court is not required to review the magistrate judge’s decision under any 23 specified standard of review.

Thomas v. Arn, 474 U.S. 140, 150 (1985). However, the 24 statute guiding review of a magistrate judge’s recommendation “does not preclude further 25 review by the district judge, sua sponte or at the request of a party, under a de novo or 26 any other standard.” Id. at 154. 27 The Court has reviewed the complaint (Doc. 1), the opening brief (Doc. 16), the 28 response brief (Doc.

20), the reply brief (Doc. 21), and the R&R (Doc. 22). The Court 1) finds the R&R well reasoned, and agrees with Judge Markovich’s conclusions. Accordingly, IT IS ORDERED: 3 1. The R&R is ADOPTED. (Doc. 22.) 4 2. The final decision by the Commissioner of Social Security is REVERSED AND > REMANDED for further proceedings in accordance with Magistrate Judge 6 Markovich’s R&R.

Dated this 5th day of March, 2026. 8 9 il FT KN Cyl.— D Honorable Raner ©. Collins sernior United States District Judge 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 -2-