

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF
MASSACHUSETTS

Roland Garrett v. Social Security Administration

Garrett · No. 25-13833-MJJ · Decided December 31, 2025

SUMMARY

The United States District Court for the District of Massachusetts grants Roland Garrett leave to proceed in forma pauperis and addresses his challenge to the termination of Social Security benefits. The court denies a temporary restraining order, keeps the preliminary-injunction request under advisement, orders transmission of the action to the Social Security Administration, and dismisses claims for monetary damages.

CASE DETAILS

COURT	United States District Court for the District of Massachusetts
WRITING FOR THE COURT	Myong J. Joun
JURISDICTION	United States District Court for the District of Massachusetts
DECIDED	December 31, 2025
DOCKET	25-13833-MJJ
DISPOSITION	other
PROCEDURAL POSTURE	Pro se plaintiff brought an action alleging that the Social Security Administration wrongfully terminated his benefits and sought leave to proceed in forma pauperis, emergency injunctive relief, and \$50,000 in damages. The district court screened the complaint under 28 U.S.C. § 1915(e)(2), granted in forma pauperis status, denied the request for a temporary restraining order in part, kept the preliminary-injunction request under advisement, ordered transmission of the action to the SSA under the Supplemental Rules for Social Security Actions, and dismissed the damages claims.
STANDARD OF REVIEW	The court reviewed the complaint under the screening standard in 28 U.S.C. § 1915(e)(2), liberally construing the pro se pleading. The court also applied the strict-construction principles governing waivers of sovereign immunity and the requirements for judicial review under 42 U.S.C. § 405(g).
PRECEDENTIAL VALUE	unpublished district court memorandum and order

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QUESTIONS PRESENTED

1. Whether Garrett should be permitted to proceed without prepayment of the filing fee.
2. Whether the complaint and emergency request should be screened or dismissed under 28 U.S.C. § 1915(e)(2).
3. Whether Garrett's Social Security claim could proceed under 42 U.S.C. § 405(g) despite uncertainty regarding exhaustion and the existence of a final agency decision.
4. Whether the Social Security Act permits Garrett to recover monetary damages for alleged wrongful termination or mishandling of benefits.
5. Whether Garrett was entitled at that stage to a temporary restraining order and preliminary injunctive relief.

HOLDINGS

1. The motion for leave to proceed in forma pauperis was granted.
2. A complaint filed by a plaintiff proceeding without prepayment of the filing fee is subject to preliminary screening under 28 U.S.C. § 1915(e)(2), with a pro se complaint liberally construed.
3. The action would not be dismissed at that stage solely because exhaustion and a final SSA decision were unclear; instead, the Clerk was ordered to transmit the complaint and emergency motion to the SSA under Rule 3 of the Supplemental Rules for Social Security Actions.
4. Claims for monetary damages arising under the Social Security Act were dismissed because § 405(g) does not provide a damages remedy and § 405(h) makes § 405(g) the exclusive route for claims arising under the Act.

KEY QUOTATIONS

“A “final decision” arises when (1) the Appeals Council of the SSA denies an individual request for further review of the decision of the administrative law judge; or (2) the Appeals Council does decide to review the individuals claims and issues its decision.” (Section II.B)

“Section § 405(g) does not contain a damages remedy, and it is the exclusive method “to recover on any claim arising under” the Social Security Act.” (Section II.C)

FACTUAL BACKGROUND

Garrett alleged that the SSA scheduled termination of all of his state and federal services in Massachusetts without warning or notice, effective January 1, 2026. He asserted that he could not pay rent and faced eviction. He sought to stop the termination and requested \$50,000 in damages, but the record did not establish whether he had exhausted the administrative process or received a final decision from the SSA Appeals Council.

PROCEDURAL HISTORY

Garrett filed a complaint alleging that the SSA scheduled termination of his state and federal services effective January 1, 2026. He also filed an in forma pauperis motion and an emergency motion seeking injunctive relief. The court conducted preliminary screening, concluded that the SSA could provide information regarding exhaustion and the status of any final agency decision, directed the Clerk to transmit the complaint and emergency motion to the SSA, and dismissed claims seeking monetary damages.

DISPOSITION

other

CASES CITED

- FDIC v. Meyer, 510 U.S. 471, 475 (1994)
- United States v. Nordic Village, Inc., 503 U.S. 30, 33-34 (1992)
- Irwin v. Department of Veterans Affairs, 498 U.S. 95 (1990)
- Sims v. Apfel, 530 U.S. 103, 106-07 (2000)
- Schweiker v. Chilicky, 487 U.S. 412, 424-25 (1988)
- Weinberger v. Salfi, 422 U.S. 749, 756-61 (1975)
- Toth v. Commissioner of Social Security, 705 F. App'x 138 (3d Cir. 2017) (per curiam)
- Bowen v. City of New York, 476 U.S. 467, 479-80 (1986)

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