

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Brenda Dee Baker Riojas v. Commissioner of Social Security

Baker Riojas · No. 1:24-cv-00688-HBK · Decided September 12, 2025

SUMMARY

The United States District Court for the Eastern District of California grants the parties’ stipulated motion for attorney’s fees under the Equal Access to Justice Act. Following a sentence-four remand in a Social Security case, the court awards \$11,500 in attorney’s fees and expenses, subject to applicable Treasury Offset Program provisions.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Helena M. Barch-Kuchta
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	September 12, 2025
DOCKET	1:24-cv-00688-HBK
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for an award of attorney fees and expenses under the Equal Access to Justice Act after obtaining a sentence-four remand in a Social Security action. The motion was stipulated and unopposed.
STANDARD OF REVIEW	The court determined whether the statutory prerequisites for an EAJA award were satisfied, including prevailing-party status, substantial justification, special circumstances, and timeliness.
PRECEDENTIAL VALUE	Unknown; district-court fee order with no reported citation.
PARTIES	Brenda Dee Baker Riojas v. Commissioner of Social Security

TOPICS

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

PRACTICE AREAS

- Social Security
- administrative law
- attorney fees
- civil procedure

QUESTIONS PRESENTED

1. Whether Plaintiff was a prevailing party entitled to attorney fees under the Equal Access to Justice Act after obtaining a sentence-four remand.
2. Whether the government established that its position was substantially justified or that special circumstances made an EAJA award unjust.
3. Whether the stipulated amount of \$11,500 in attorney fees and expenses should be awarded, subject to any Treasury Offset Program offset.

HOLDINGS

1. A party who obtains a sentence-four remand under 42 U.S.C. § 405(g) is a prevailing party eligible to seek an EAJA award, and Plaintiff was entitled to seek fees as the prevailing party.
2. The government did not show that its position was substantially justified, and no special circumstances made an award unjust; therefore, the statutory exception to an EAJA award did not apply.
3. The court awarded Plaintiff \$11,500 in attorney fees and expenses under the EAJA, subject to any allowable Treasury Offset Program offset and the terms of the stipulated motion.

KEY QUOTATIONS

“Under the Act, a court shall award attorney fees to the prevailing party unless it finds the government’s position was “substantially justified or that special circumstances make such an award unjust.”” (1)

FACTUAL BACKGROUND

The underlying action sought judicial review of a Social Security decision. The court remanded the case to the Commissioner under sentence four of 42 U.S.C. § 405(g), making Plaintiff a prevailing party for EAJA purposes. Plaintiff's counsel and the Commissioner stipulated to an award of \$11,500 in attorney fees and expenses, and the Commissioner did not oppose the requested relief.

PROCEDURAL HISTORY

On August 21, 2025, the court remanded the case to the Commissioner for further administrative proceedings under sentence four of 42 U.S.C. § 405(g), and judgment was entered that day. Plaintiff then sought EAJA fees as the prevailing party. The court granted the parties' stipulated motion and awarded \$11,500 in attorney fees and expenses.

DISPOSITION

other

CASES CITED

- Shalala v. Schaefer, 509 U.S. 292, 300-02
- Astrue v. Ratliff, 532 U.S. 1192

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