

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
LOUISIANA

P.A.J. v. Social Security Administration

Civil Action No. 25-491, Social Security Section "H" (3) · No. 25-491 · Decided January 13, 2026

SUMMARY

The report and recommendation addresses an unopposed motion by the Commissioner of Social Security to reverse the denial of the claimant’s disability benefits applications and remand for further administrative proceedings. The magistrate judge recommends granting the motion and entering a sentence-four remand under 42 U.S.C. § 405(g).

CASE DETAILS

COURT	United States District Court for the Eastern District of Louisiana
JURISDICTION	United States District Court for the Eastern District of Louisiana
DECIDED	January 13, 2026
DOCKET	25-491
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Claimant sought judicial review of the Commissioner of Social Security's final decision denying applications for disability insurance benefits. The Commissioner filed an unopposed motion requesting reversal and remand for further administrative proceedings. The magistrate judge issued a report and recommendation recommending that the motion be granted and that the decision be reversed and remanded under sentence four of 42 U.S.C. § 405(g).
STANDARD OF REVIEW	Under sentence four of 42 U.S.C. § 405(g), the district court reviews the administrative decision on the pleadings and transcript of the record and may affirm, modify, or reverse it, with or without remand. Reversal and remand are appropriate when the administrative record is insufficient to support the denial and further fact-finding is necessary.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	P.A.J. v. Social Security Administration, 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

disability benefits

judicial review of agency action

remedies

QUESTIONS PRESENTED

1. Whether the Commissioner's unopposed motion for reversal and remand should be granted under sentence four of 42 U.S.C. § 405(g).
2. Whether the administrative record was insufficient to support the SSA's denial of benefits and required further administrative fact-finding.

HOLDINGS

1. Reversal of the Commissioner's denial of benefits and remand for further administrative proceedings was appropriate because the Commissioner effectively conceded that the administrative record was insufficient to support the final decision.
2. A sentence-four remand constitutes a final judgment for the plaintiff and terminates the district court's jurisdiction over the remanded claims once issued.

KEY QUOTATIONS

“A sentence-four remand order “terminates the litigation with victory for the plaintiff” and constitutes a final judgment on the remanded claims, divesting the district court of jurisdiction thereover once issued.”

“reversal of the Commissioner’s denial of benefits and remand for further proceedings is appropriate under sentence four of § 405(g) when the administrative record is insufficient to support that denial and further fact-finding is necessary for statutorily adequate resolution of the plaintiff’s claims.”

FACTUAL BACKGROUND

P.A.J. applied for disability insurance benefits under Title II of the Social Security Act. The SSA denied the applications in a final decision. In the judicial-review action, the Commissioner conceded that remand was appropriate and stated that the SSA would offer P.A.J. a new hearing.

PROCEDURAL HISTORY

P.A.J. filed an action seeking review of a final SSA decision denying disability insurance benefits. The Commissioner moved without opposition for entry of judgment reversing the decision and remanding the claims for further proceedings, including a new hearing. The magistrate judge recommended granting the motion and entering a sentence-four remand; the text does not state the district court's subsequent action.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The case should be remanded to the SSA for further administrative proceedings, including an opportunity for a new hearing on P.A.J.'s applications.

CASES CITED

- *Melkonyan v. Sullivan*, 501 U.S. 89, 98 (1991)
- *Shalala v. Schaefer*, 509 U.S. 292, 300-01 (1993)
- *Davis v. Colvin*, 603 F. App'x 257, 258 (5th Cir. 2015)
- *Bordelon v. Barnhart*, 161 F. App'x 348, 352-53 n.12 (5th Cir. 2005)
- *Sullivan v. Finkelstein*, 496 U.S. 617, 626 (1990)
- *Douglass v. United Services Auto. Assn*, 79 F.3d 1415, 1430 (5th Cir. 1996) (en banc)

OPINION

Jernigan

PER CURIAM.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF LOUISIANA
P.A.J. CIVIL ACTION
VERSUS NO. 25-491
SOCIAL SECURITY SECTION "H" (3)
ADMINISTRATION
REPORT AND RECOMMENDATION

Claimant seeks judicial review of a final decision the Social Security Administration (the “SSA”) denying her applications for disability insurance benefits under Title II of the Social Security Act.¹ The SSA, through Commissioner Frank Bisignano (the “Commissioner”),² has filed an unopposed motion (R. Doc. 24) to reverse that final decision and remand Claimant's claims to the SSA for further administrative proceedings. For the following reasons, the undersigned recommends that the Motion be granted and that a judgment be entered reversing the challenged decision and remanding the above-captioned action, as requested, under the fourth sentence of 42 U.S.C. § 405(g). I. Law and Analysis Sentence four of § 405(g) authorizes federal district courts to enter, upon the pleadings and transcript of the record, “a judgment affirming, modifying, or reversing the decision of the [Commissioner of Social Security], with or without remanding the 1 R. Doc. 1; see also R. Doc. 15. 2 Frank Bisignano became the Commissioner of Social Security on May 6, 2025. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Mr. Bisignano should be substituted as the defendant in this suit. No further action need be taken to continue this suit by

reason of the last sentence of Section 205(g) of the Social Security Act, 42 U.S.C. § 405(g). cause for a rehearing.” See also *Melkonyan v. Sullivan*, 501 U.S. 89, 98 (1991). A sentence-four remand order “terminates the litigation with victory for the plaintiff” and constitutes a final judgment on the remanded claims, divesting the district court of jurisdiction thereover once issued. *Shalala v. Schaefer*, 509 U.S. 292, 300–01

(1993). The United States Court of Appeals for the Fifth Circuit has explained that sentence four “grants district courts ‘wide discretion’ to remand a case for further proceedings[.]” and regularly affirms sentence-four remand orders where “important and unresolved aspects of [the plaintiff]’s claim should first be addressed by the administrative law judge.” *Davis v. Colvin*, 603 F. App’x 257, 258 (5th Cir. 2015) (quoting *Bordelon v. Barnhart*, 161 F. App’x. 348, 352–53 n.12 (5th Cir. 2005)). Accordingly, reversal of the Commissioner’s denial of benefits and remand for further proceedings is appropriate under sentence four of § 405(g) when the administrative record is insufficient to support that denial and further fact-finding is necessary for statutorily adequate resolution of the plaintiff’s claims. See *Sullivan v. Finkelstein*, 496 U.S. 617, 626 (1990). Here, the Commissioner requests remand and states that the SSA will offer Plaintiff the opportunity for a new hearing on her applications.³ Based on this effective concession that the record before the Court remains insufficient to support the SSA’s final decision denying Plaintiff’s applications for social security benefits, reversal of that decision and remand for further proceedings is appropriate. 3 R. Doc. 24. II. Recommendation For the foregoing reasons, IT IS RECOMMENDED that the Commissioner’s Unopposed Motion for Entry of Judgment with Remand (R. Doc. 24) be GRANTED, and judgment be entered REVERSING the decision of the Commissioner and REMANDING the case for further administrative proceedings. A party’s failure to file written objections to the proposed findings, conclusions, and recommendation in a magistrate judge’s report and recommendation within fourteen days after being served with a copy shall bar that party, except upon grounds of plain error, from attacking on appeal the unobjected-to proposed factual findings and legal conclusions accepted by the district court, provided that the party has been served with notice that such consequences will result from a failure to object. 28 U.S.C. § 636(b)(1); *Douglass v. United Services Auto. Assn*, 79 F.3d 1415, 1430 (5th Cir. 1996) (en banc). New Orleans, Louisiana, this day of January, 2026.

UNITED STATES MAGISTRATE JUDGE