

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Pat Darwin Caudill v. Commissioner of Social Security

No. 1:22-cv-01154-CDB (SS) (E.D. Cal. Dec. 9, 2025) · No. 1:22-cv-01154-CDB (SS) · Decided December 9, 2025

SUMMARY

The United States District Court for the Eastern District of California granted the parties’ stipulated request for attorney’s fees and costs under the Equal Access to Justice Act and 28 U.S.C. § 1920. The court awarded \$7,700.00 in attorney’s fees and \$402.00 in costs to the plaintiff, subject to Treasury Offset Program requirements and potential direct payment to plaintiff’s counsel.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	December 9, 2025
DOCKET	1:22-cv-01154-CDB (SS)
DISPOSITION	other
PROCEDURAL POSTURE	Following a sentence-four remand in a Social Security case and entry of judgment for Plaintiff, the parties stipulated to an award of attorney fees under the Equal Access to Justice Act and costs under 28 U.S.C. § 1920.
STANDARD OF REVIEW	The Court evaluated whether Plaintiff was a prevailing party under the EAJA, whether the government's position was substantially justified, whether special circumstances made an award unjust, and whether the requested fees and costs were reasonable.
PRECEDENTIAL VALUE	Unpublished district court order; limited persuasive value.
PARTIES	Pat Darwin Caudill v. Commissioner of Social Security

TOPICS

- attorney fees
- costs
- judicial review of agency action
- summary judgment
- administrative law

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether Plaintiff qualified as a prevailing party entitled to attorney fees under the Equal Access to Justice Act after obtaining a sentence-four remand.
2. Whether the government's position was substantially justified or special circumstances made an EAJA fee award unjust.
3. Whether Plaintiff was entitled to the stipulated \$7,700 attorney-fee award and \$402 cost award.
4. Whether the fee, expense, and cost award was subject to Treasury Offset Program deductions and conditional direct payment to Plaintiff's counsel.

HOLDINGS

1. A party who obtains a sentence-four remand under 42 U.S.C. § 405(g) is a prevailing party for purposes of the EAJA.
2. Plaintiff was entitled to an EAJA attorney-fee award because he prevailed, timely sought fees, the government did not establish substantial justification, and no special circumstances made an award unjust.
3. The stipulated request for \$7,700 in EAJA attorney fees was reasonable and should be awarded.
4. Plaintiff was entitled to the stipulated \$402 award of costs under 28 U.S.C. §§ 2412(a)(1) and 1920.
5. EAJA fees, expenses, and costs remain subject to permissible Treasury Offset Program deductions; if no federal debt offset applies, payment may be made directly to Plaintiff's counsel as provided in the stipulation.

KEY QUOTATIONS

“Under the EAJA, 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.”” (at 1)

*“EAJA fees, expenses, and costs are subject to any offsets allowed under the Treasury Offset Program (“TOP”), as discussed in *Astrue v. Ratliff*, 560 U.S. 586 (2010).”* (at 3)

FACTUAL BACKGROUND

Plaintiff prevailed on summary judgment in his Social Security action and obtained a sentence-four remand for further proceedings. He sought \$7,700 in EAJA attorney fees and \$402 in costs, with payment to be made to Plaintiff and, if no federal debt offset applied, directly to his counsel. The Court found the requested amount reasonable based on approximately 32 hours of attorney work, review of an approximately 2,078-page administrative record, and preparation of a 14-page summary-judgment argument.

PROCEDURAL HISTORY

The Court granted Plaintiff's motion for summary judgment on September 23, 2025, remanded the case to the Commissioner for further proceedings under 42 U.S.C. § 405(g), and entered judgment the same day. Plaintiff filed a timely stipulation for attorney fees and costs on December 8, 2025, and the Commissioner did not oppose the request.

DISPOSITION

other

REMAND INSTRUCTIONS

No new remand was ordered in this fee proceeding. The prior sentence-four remand directed the Commissioner to conduct further proceedings consistent with the Court's September 23, 2025 order.

CASES CITED

- *Shalala v. Schaefer*, 509 U.S. 292, 300-02 (1993)
- *Van v. Barnhart*, 483 F.3d 600, 607 (9th Cir. 2007)
- *Sanchez v. Berryhill*, No. 1:16-cv-01081-SKO, 2018 WL 509817, at *2 (E.D. Cal. Jan. 23, 2018)
- *Knyazhina v. Colvin*, No. 2:12-cv-2726 DAD, 2014 WL 5324302, at *1 (E.D. Cal. Oct. 17, 2014)
- *Thangaraja v. Gonzales*, 428 F.3d 870, 876-77 (9th Cir. 2005)
- *Armstrong v. Astrue*, No. CIV-S-07-1456-DAD, 2008 WL 2705023, at *2 (E.D. Cal. July 9, 2008)
- *Astrue v. Ratliff*, 560 U.S. 586 (2010)

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