

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
FLORIDA, TAMPA DIVISION

Corinne Crystal Woodland v. Frank Bisignano

Woodland · No. 8:25-CV-1360-AAS · Decided January 30, 2026

SUMMARY

The United States District Court for the Middle District of Florida grants Corinne Crystal Woodland’s unopposed motion for \$9,987.69 in attorney’s fees under the Equal Access to Justice Act. The court finds that Woodland is the prevailing party following a sentence-four remand of her Social Security case and explains that the fees may be offset against any federal debt, subject to her assignment of the fees to counsel.

CASE DETAILS

COURT	United States District Court for the Middle District of Florida, Tampa Division
JURISDICTION	United States District Court for the Middle District of Florida, Tampa Division
DECIDED	January 30, 2026
DOCKET	8:25-CV-1360-AAS
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff moved for attorney's fees under the Equal Access to Justice Act after the court remanded the Commissioner's final decision under sentence four of 42 U.S.C. § 405(g). The Commissioner did not oppose the motion.
STANDARD OF REVIEW	The court considered whether the unopposed EAJA fee request was reasonable and whether the statutory requirements for an award were satisfied.
PRECEDENTIAL VALUE	unpublished
PARTIES	Corinne Crystal Woodland v. Frank Bisignano, Commissioner of the Social Security Administration

TOPICS

attorney fees

remedies

civil procedure

PRACTICE AREAS

Social Security

administrative law

attorney's fees

federal civil procedure

QUESTIONS PRESENTED

1. Whether Woodland was entitled to an award of \$9,987.69 in attorney's fees under the Equal Access to Justice Act.
2. Whether an EAJA fee award should be paid directly to Woodland's counsel under her assignment, subject to offset for any qualifying federal debt.

HOLDINGS

1. Woodland was entitled to \$9,987.69 in attorney's fees under the EAJA because she was the prevailing party, the Commissioner's position was not substantially justified, and the unopposed fee request was reasonable.
2. The EAJA award may be offset to satisfy Woodland's pre-existing debt to the United States; if she has no qualifying federal debt, the United States will accept her assignment of the EAJA fees and pay them directly to counsel.

KEY QUOTATIONS

"A court should grant a Social Security claimant's request for attorney's fees when it is unopposed."

FACTUAL BACKGROUND

Woodland obtained a sentence-four remand of the Commissioner's final Social Security decision for further administrative proceedings. Judgment was entered in her favor. She assigned her rights to EAJA fees to her attorney and requested \$9,987.69 in fees; the Commissioner did not oppose the request.

PROCEDURAL HISTORY

On November 13, 2025, the court remanded the Commissioner's final decision for further administrative proceedings under sentence four of 42 U.S.C. § 405(g), and the Clerk entered judgment for Woodland. Woodland then moved for \$9,987.69 in EAJA attorney's fees. The Commissioner did not oppose the motion or contest Woodland's prevailing-party status, the lack of substantial justification, or the reasonableness of the requested amount.

DISPOSITION

other

CASES CITED

- Jones v. Colvin, No. 8:13-CV-2900-T-33AEP, 2015 WL 7721334 (M.D. Fla. Nov. 30, 2015)
- Astrue v. Ratliff, 560 U.S. 586, 589 (2010)

OPINION

UNITED STATES DISTRICT COURT MIDDLE DISTRICT OF FLORIDA TAMPA DIVISION
CORINNE CRYSTAL WOODLAND, Plaintiff, v. Case No.: 8:25-CV-1360-AAS FRANK
BISIGNANO, Commissioner of the Social Security Administration,¹ Defendant.
_____/ ORDER Plaintiff Corrine Crystal Woodland
moves for attorney's fees under the Equal Access to Justice Act (EAJA), 28 U.S.C. Section 2412.

(Doc. 25). The Commissioner does not oppose the motion. (Id. at p. 4). Ms. Woodland requests \$9,987.69 in attorney's fees. The EAJA permits awards for reasonable attorney's fees and costs to a prevailing party against the United States. 28 U.S.C. § 2412. A November 13, 2025 order remanded the Commissioner's final decision under sentence four of 42 U.S.C. Section 405(g) for further administrative proceedings.

(Doc. 22). The Clerk of Court entered judgment in favor of Ms. Woodland. (Doc. 23). 1 Frank Bisignano became the Commissioner of Social Security on May 7, 2025. Under Rule 25(d) of the Federal Rules of Civil Procedure, Mr. Bisignano should be substituted as the defendant in this suit.

The Commissioner does not contest the following: Ms. Woodland is the prevailing party; the Commissioner's position was not substantially justified; and Ms. Woodland attorney's fees request is reasonable. A court should grant a Social Security claimant's request for attorney's fees when it is unopposed. See *Jones v. Colvin*, No. 8:13-CV-2900-T-33AEP, 2015 WL 7721334 (M.D.

Fla. Nov. 30, 2015) (awarding unopposed attorney's fees request). Thus, Ms. Woodland is entitled to \$9,987.69 in attorney's fees. Attorney's fees awarded to a claimant under the EAJA can be offset to satisfy the claimant's pre-existing debt to the United States. *Astrue v. Ratliff*, 560 U.S. 586, 589 (2010). Following an order, the United States Department of the Treasury will determine whether Ms. Woodland owes a debt to the United States.

Ms. Woodland assigned her rights to EAJA fees to her attorney. (Doc. 25-2). So, if Ms. Woodland has no federal debt, the United States will accept her assignment of EAJA fees and will pay them directly to counsel. Accordingly, it is ORDERED that Ms. Woodland's motion for attorney's fees under the EAJA (Doc. 25) is GRANTED. Ms. Woodland is awarded \$9,987.69 in attorney's fees.

ORDERED in Tampa, Florida, on January 30, 2026. Aranda. Apnoh. Sasa United States Magistrate Judge