

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
MICHIGAN, NORTHERN DIVISION

Laurie A. Hubbard v. Commissioner of Social Security

Hubbard · No. 2:25-cv-43 · Decided December 9, 2025

SUMMARY

The United States District Court for the Western District of Michigan adopted the magistrate judge’s report and recommendation and affirmed the Commissioner of Social Security’s denial of Laurie A. Hubbard’s application for disability insurance benefits before her insured status expired. The court concluded that Hubbard’s objections were general disagreements and did not identify a specific factual or legal error warranting de novo review.

CASE DETAILS

COURT	United States District Court for the Western District of Michigan, Northern Division
WRITING FOR THE COURT	Paul L. Maloney
JURISDICTION	United States District Court for the Western District of Michigan, Northern Division
DECIDED	December 9, 2025
DOCKET	2:25-cv-43
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review of the Commissioner's final decision denying disability insurance benefits for the period before October 23, 2023. A magistrate judge recommended affirmance. Plaintiff objected, and the district court reviewed the objections and adopted the report and recommendation.
STANDARD OF REVIEW	Under 28 U.S.C. § 636(b)(1) and Federal Rule of Civil Procedure 72(b)(3), the district court reviews de novo the portions of a magistrate judge's report and recommendation to which specific objections are made. General objections do not trigger de novo review. The court reviews the Commissioner's final decision under the applicable Social Security judicial-review standard.
PRECEDENTIAL VALUE	Unknown

PARTIES

Laurie A. Hubbard v. Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

civil procedure

exhaustion of remedies

PRACTICE AREAS

Social Security disability benefits

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether Hubbard's objections to the magistrate judge's report and recommendation were sufficiently specific to require de novo review.
2. Whether the magistrate judge correctly recommended affirming the Commissioner's determination that Hubbard was not disabled before the expiration of her insured status.
3. Whether the district court could consider medical conditions raised for the first time in objections and not presented to the Social Security Administration, the ALJ, or the magistrate judge.

HOLDINGS

1. Only specific objections to a magistrate judge's proposed findings and recommendations are entitled to de novo review; general disagreements with the report, the ALJ, or the process are insufficient.
2. The district court could not consider medical conditions that Hubbard had not presented to the Social Security Administration, the ALJ, or the magistrate judge.
3. The Commissioner's decision denying disability insurance benefits for the period before October 23, 2023, was affirmed.

KEY QUOTATIONS

"A district court judge reviews de novo the portions of the R&R to which objections have been filed."

"Only those objections that are specific are entitled to a de novo review under the statute."

"Plaintiff has not identified any factual or legal error in the R&R with sufficient specificity."

FACTUAL BACKGROUND

Hubbard applied for disability insurance benefits and alleged that she had been disabled since 2018. The ALJ found that she became disabled on October 23, 2023, but not before that date, while her insured status expired on December 31, 2022. In her objections, Hubbard relied on lupus or undifferentiated connective tissue disease, alleged limitations despite treatment, and daily-function limitations, and also raised leg injuries and a re-diagnosis of epilepsy that had not been presented to the agency.

PROCEDURAL HISTORY

Hubbard applied for disability insurance benefits in 2021, alleging disability beginning in 2018. The administrative law judge determined that she was disabled beginning October 23, 2023, but not before that date, and her insured status expired on December 31, 2022. The magistrate judge recommended affirming the Commissioner's decision. The district court concluded that Hubbard's objections were general and insufficiently specific, adopted the report and recommendation, and affirmed.

DISPOSITION

affirmed

CASES CITED

- 806 F.2d 636, 637 (6th Cir. 1986) (per curiam)

OPINION

Hubbard

PER CURIAM.

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF MICHIGAN

NORTHERN DIVISION

LAURIE A. HUBBARD,)

Plaintiff,)) No. 2:25-cv-43 -v-)) Honorable Paul L. Maloney

COMMISSIONER OF SOCIAL SECURITY,)

Defendant.))

ORDER ADOPTING REPORT AND RECOMMENDATION

Plaintiff Laurie Hubbard, proceeding without the assistance of counsel, challenges the final decision of the Commissioner of Social Security denying her application for disability insurance benefits. The Magistrate Judge issued a report recommending the court affirm the decision (ECF No. 22). Plaintiff filed objections (ECF No. 23). The court will adopt the report and recommendation. After being served with a report and recommendation (R&R) issued by a magistrate judge, a party has fourteen days to file written objections to the proposed findings and recommendations. 28 U.S.C. § 636(b)(1); Fed. R. Civ. P. 72(b)(2). A district court judge reviews de novo the portions of the R&R to which objections have been filed. 28 U.S.C. § 636(b)(1); Fed. R. Civ. P. 72(b)(3). Only those objections that are specific are entitled to a de novo review under the statute. , 806 F.2d 636, 637 (6th Cir. 1986) (per curiam). Plaintiff filed for benefits in 2021 alleging she had been disabled since 2018. The ALJ issued an opinion in January 2024. The ALJ found that Plaintiff had been disabled since October 23, 2023, but not prior to that date. Plaintiff's insured status expired on December 31, 2022. To be eligible for disability insurance benefits under Title II, Plaintiff needed to show that she became disabled prior to the expiration of her insured status. In the R&R, the Magistrate Judge addresses three arguments Plaintiff raised in her appeal.

First, Plaintiff alleges she was diagnosed with lupus / undifferentiated connective tissue disease well before the hearing with the ALJ. She asserts she has seen a doctor for lupus going back to 2019 and that her medical records show issues dating back to 2017. Second, Plaintiff argues that the ALJ erred in concluding that, with treatment, Plaintiff should recover and be employable. Plaintiff contends her medical records do not support that conclusion. Finally, the Magistrate Judge interprets Plaintiff's brief as arguing that her ability to function on a daily basis is severely limited. The Magistrate Judge addressed each argument and explained why Plaintiff failed to show an error in the ALJ's decision. The court has carefully reviewed Plaintiff's objections. The court is sympathetic to Plaintiff's situation; she has serious health issues and the process for obtaining benefits can be difficult. Nevertheless, the court cannot provide Plaintiff with any relief because she has not met her burden at this stage in the process. Plaintiff's objections constitute general disagreements with the process, the ALJ and the Magistrate Judge's conclusions. Plaintiff has not identified any factual or legal error in the R&R with sufficient specificity. For example, the Magistrate Judge finds that even if Plaintiff's evidence would support a diagnosis of Lupus, Plaintiff has not pointed to evidence establishing limitations in a greater degree than those identified by the ALJ in his assessment. Plaintiff clearly disagrees with these findings, but does not point to specific evidence in the record that she presented to the ALJ or explain why counsel did not present the evidence to the ALJ. At the end of her objections, Plaintiff informs the court that she recently had an appointment with a surgeon to repair injuries to her left leg. She also informs the court she has been re-diagnosed with epilepsy. She did not present either of these issues to the Social Security Administration, to the ALJ or to the Magistrate Judge and this court cannot consider either of these conditions. Accordingly, the court ADOPTS the Report and Recommendation (ECF No. 22) and AFFIRMS the decision of the Commissioner of Social Security. IT IS SO ORDERED. Date: December 9, 2025 /s/ Paul L. Maloney Paul L. Maloney
United States District Judge