

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
NORTH CAROLINA, CHARLOTTE DIVISION

Stefanie Pickard v. Commissioner of Social Security

Pickard · No. 3:25-CV-00121-MEO-WCM · Decided April 8, 2026

SUMMARY

The court reviews and adopts a magistrate judge’s Memorandum and Recommendation recommending affirmance of the Commissioner of Social Security’s denial of Plaintiff’s disability benefits. Because no party objected, the court applied clear-error review, adopted the recommendation, affirmed the Commissioner’s decision, and directed the clerk to close the case.

CASE DETAILS

COURT	United States District Court for the Western District of North Carolina, Charlotte Division
JURISDICTION	United States District Court for the Western District of North Carolina, Charlotte Division
DECIDED	April 8, 2026
DOCKET	3:25-CV-00121-MEO-WCM
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff appealed the denial of Social Security disability benefits. The district court reviewed the magistrate judge's memorandum and recommendation, to which no party objected, and affirmed the Commissioner's decision.
STANDARD OF REVIEW	When no timely objection is filed to a magistrate judge's memorandum and recommendation, the district court need only determine whether there is clear error on the face of the record before adopting the recommendation; de novo review is required for portions to which a timely objection is made.
PRECEDENTIAL VALUE	Unpublished district court order; persuasive rather than precedential authority.
PARTIES	Stefanie Pickard v. Commissioner of Social Security

TOPICS

- judicial review of agency action
- administrative law
- civil procedure

PRACTICE AREAS

social security

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. What standard of review applies when no party timely objects to a magistrate judge's memorandum and recommendation?
2. Whether the magistrate judge's recommendation to affirm the Commissioner's denial of Social Security disability benefits contained clear error.

HOLDINGS

1. When no timely objection is filed, the district court need not conduct de novo review and instead must satisfy itself that there is no clear error on the face of the record before accepting the recommendation.
2. The magistrate judge's memorandum and recommendation was adopted, and the Commissioner's decision denying Social Security disability benefits was affirmed because the district court found no clear error in the M&R.

KEY QUOTATIONS

“in the absence of a timely filed objection, a district court need not conduct a de novo review, but instead must ‘only satisfy itself that there is no clear error on the face of the record in order to accept the recommendation’”

“After reviewing the record, the court may accept, reject, or modify, in whole or in part, the findings or recommendations made by the magistrate judge or recommit the matter with instructions.”

FACTUAL BACKGROUND

The opinion adopts the factual background stated in the magistrate judge's memorandum and recommendation because no party objected to it. The underlying dispute concerns the Commissioner's denial of Plaintiff's claim for Social Security disability benefits. The district court's order does not independently recite the material medical or vocational facts.

PROCEDURAL HISTORY

The Commissioner denied Plaintiff's application for Social Security disability benefits. Plaintiff appealed to the district court, and the matter was referred to a magistrate judge, whose memorandum and recommendation advised affirmance. Because no party filed objections, the district court reviewed the record for clear error, adopted the M&R, affirmed the Commissioner's decision, and directed the Clerk to close the matter.

DISPOSITION

affirmed

CASES CITED

- *Diamond v. Colonial Life & Accident Insurance Co.*, 416 F.3d 310, 315 (4th Cir. 2005)
- *Camby v. Davis*, 718 F.2d 198, 199-200 (4th Cir. 1983)

OPINION

Pickard

PER CURIAM.

UNITED STATES DISTRICT COURT

WESTERN DISTRICT OF NORTH CAROLINA

CHARLOTTE DIVISION

3:25-CV-00121-MEO-WCM

STEFANIE PICKARD,)

) Plaintiff,)) v.) ORDER)

COMMISSIONER OF SOCIAL)

SECURITY,)

) Defendant.)) THIS MATTER is before the Court on Plaintiff’s Appeal from the denial of Social Security Disability Benefits by Defendant Commissioner of Social Security (“Commissioner”) (Doc. No. 5), the Commissioner’s Response (Doc. No. 8), Plaintiff’s Reply (Doc. No. 9), and the Magistrate Judge’s Memorandum and Recommendation (“M&R”) (Doc. No. 10) recommending that the Commissioner’s decision be affirmed. The parties have not filed objections to the M&R, and the time for doing so has expired. Fed. R. Civ. P. 72(b)(2).

I. BACKGROUND

No party has objected to the Magistrate Judge’s statement of the factual and procedural background of this case. Therefore, the Court adopts the facts as set forth in the M&R.

II. STANDARD OF REVIEW

A district court may assign dispositive pretrial matters to a magistrate judge for “proposed findings of fact and recommendations for the disposition” of such matters. 28 U.S.C. § 636(b)(1). Any party may object to the magistrate judge’s proposed findings and recommendations, and the court “shall make a de novo determination of those portions of the report or specified proposed findings or recommendations to which objection is made.” *Id.*; Fed. R. Civ. P. 72(b)(3). However, “in the absence of a timely filed objection, a district court need not conduct a de novo review, but instead must ‘only satisfy itself that there is no clear error on the face of the record in order to accept the recommendation’” and need not give any explanation for adopting the M&R. *Diamond v. Colonial Life & Acc. Ins. Co.*, 416 F.3d 310, 315 (4th Cir. 2005) (quoting Fed. R. Civ. P. 72 advisory committee’s note); *Camby v. Davis*, 718 F.2d 198, 199-200 (4th Cir. 1983). After reviewing the record, the court may accept, reject, or modify, in whole or in part, the findings or recommendations made by the magistrate judge or recommit the matter with instructions. 28 U.S.C. § 636(b)(1).

Ii. DISCUSSION

Having carefully reviewed the Magistrate Judge's M&R, the relevant portions of the record, and applicable legal authority, this Court is satisfied that there is no clear error as to the M&R, to which no objection was made. *Diamond*, 416 F.3d at 315. Accordingly, this Court will adopt the findings and recommendations set forth in the M&R as its own solely for the purpose of deciding the motions before it.

IV. CONCLUSION

IT IS, THEREFORE, ORDERED that:

1. The Magistrate Judge's M&R, (Doc. No. 10), is ADOPTED;
2. The Commissioner's Decision is AFFIRMED; and
3. The Clerk is directed to close this matter in accordance with this Order.

SO ORDERED. Matthew E. Orso Wy United States District Judge ey