

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
ILLINOIS, PEORIA DIVISION

Sarah A. Holmes v. Social Security Administration and Norman
Jasper Clark

Holmes · No. 1:22-cv-01080-JEH-RLH · Decided January 23, 2026

SUMMARY

The United States District Court for the Central District of Illinois recommends denying Sarah A. Holmes’s pro se motion to reopen a case previously dismissed for lack of subject-matter jurisdiction. The court concludes that the motion fails to comply with local motion requirements, provides insufficient factual or legal grounds, and does not establish a basis for relief under Federal Rule of Civil Procedure 60. The recommendation was entered on January 23, 2026.

CASE DETAILS

COURT	United States District Court for the Central District of Illinois, Peoria Division
WRITING FOR THE COURT	Ronald L. Hanna
JURISDICTION	United States District Court for the Central District of Illinois, Peoria Division
DECIDED	January 23, 2026
DOCKET	1:22-cv-01080-JEH-RLH
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff, proceeding pro se, moved to reopen a closed case after the court had dismissed it for lack of subject matter jurisdiction, insufficient process, and insufficient service. The magistrate judge issued a Report and Recommendation recommending denial of the motion.
STANDARD OF REVIEW	A motion to reopen a final judgment is analyzed under Federal Rule of Civil Procedure 60(b); the movant must identify a valid basis for relief and comply with applicable procedural rules.
PRECEDENTIAL VALUE	Unknown; Report and Recommendation from a federal district court

TOPICS

motion for reconsideration

subject matter jurisdiction

exhaustion of remedies

service of process

civil procedure

PRACTICE AREAS

Civil procedure

Administrative law

Social Security

QUESTIONS PRESENTED

1. Whether Holmes's motion to reopen should be denied for failing to identify supporting legal authority and the procedural rule authorizing the motion.
2. Whether Holmes established any basis under Federal Rule of Civil Procedure 60(b) for relief from the 2022 judgment.
3. Whether the court's prior lack of subject matter jurisdiction had ceased to exist.

HOLDINGS

1. The motion should be denied because it neither identified the legal authorities supporting the requested relief nor specified the local or federal rule under which it was filed, and it provided insufficient facts to permit meaningful analysis.
2. The motion should be denied because Holmes did not identify or establish any applicable Rule 60(b) ground, including mistake, newly discovered evidence, fraud, or another recognized basis for relief.

KEY QUOTATIONS

“although pro se filings are to be construed liberally, Erickson v. Pardus, 551 U.S. 89, 94 (2007), a litigant’s pro se status does not excuse them from complying with the rules of procedure.”

“The case cannot be reopened for any of those reasons, however, because the Court cannot determine whether any of them apply.”

FACTUAL BACKGROUND

Holmes was involved in a state-court divorce action in 2017 and later filed a motion in that closed action seeking payment of Social Security disability benefits. The Social Security Administration removed the motion to federal court and moved to dismiss. The court dismissed the case in May 2022 based on improper service and failure to exhaust administrative remedies. In late 2025, Holmes filed a brief handwritten motion seeking to reopen the case, amend arguments, hold the Social Security Administration responsible for payments, and obtain fees.

PROCEDURAL HISTORY

Holmes removed to federal court a motion filed in a previously closed state-court divorce action seeking Social Security disability payments. The court granted the Social Security Administration's motion to dismiss in May 2022 after finding improper service and failure to exhaust administrative remedies, and judgment was entered. Approximately three and a half years later, Holmes filed a one-page motion to reopen, which the court recommended denying.

DISPOSITION

other

CASES CITED

- Erickson v. Pardus, 551 U.S. 89, 94 (2007)
- Cady v. Sheahan, 467 F.3d 1057, 1061 (7th Cir. 2006)

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