

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)

OPINION

Holmes

PER CURIAM.

UNITED STATES DISTRICT COURT

CENTRAL DISTRICT OF ILLINOIS

PEORIA DIVISION

SARAH A. HOLMES,

Plaintiff, v. Case No.1:22-cv-01080-JEH-RLH

SOCIAL SECURITY

ADMINISTRATION and NORMAN

JASPER CLARK,

Defendants.

REPORT & RECOMMENDATION

The Court issued a judgment and closed this case four years ago, finding that it lacked subject matter jurisdiction. Plaintiff Sarah Holmes, representing herself, now moves to reopen it. But she does not offer any valid reasons to do so. The Court thus recommends that Holmes's Motion to Reopen, (Doc. 10), be denied. The facts of this case are outlined in the Court's May 2022 Order. In short, Holmes was involved in a state-court divorce action in 2017. (Doc. 1 at 2.) Long after it was closed, she filed a motion in that case demanding that the Social Security Administration pay her disability benefits. (Doc. 1 at 2.) The administration removed the motion to this Court, (Doc. 1), and moved to dismiss for lack of subject matter jurisdiction, insufficient process, and insufficient service, (Doc. 2). The Court granted the motion, (Doc. 8), finding that Holmes had improperly served the administration and, in any event, had failed to exhaust her administrative remedies. Judgment was entered in May 2022. (Doc. 9.) Now, three and a half years later, Holmes has filed a one-page, handwritten motion to reopen the case. (Doc. 10.) The motion states, in its entirety:

- (1) reopen
- (2) to amend it [sic] arguments
- (3) hold Social Security At fault for payments
- (4) [unclear] on the local office for abuse of Powers
- (5) Fee w. for Paper Documents

[Signature Block] (Doc. 10 at 1.) The administration did not respond to the motion, so Civil Local Rule 7.1(B)(2) allows the Court to presume it is unopposed and rule without further notice to the parties. At the outset, Civil Local Rule 7.1(B)(1) requires that “[e]very motion raising a question of law” identify (1) “the specific points or propositions of law and supporting authorities upon which the moving party relies,” and (2) “the local or federal rule under which the motion is filed.” And, 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. See *Cady v. Sheahan*, 467 F.3d 1057, 1061 (7th Cir. 2006). Holmes’s motion satisfies neither requirement and should be denied on this ground alone. It does not cite any legal authority, nor does it identify the procedural rule that authorizes it. What is more, the motion does not recite any facts: it does not say what, if anything, has changed between 2022 and now; it does not indicate whether Holmes has pursued her administrative remedies; and it does not specify which arguments Holmes seeks to amend. Put simply, the motion is far too sparse for the Court to conduct any meaningful analysis. To the extent the Court can analyze the motion, it fares no better on the merits. The Court interprets Holmes to be seeking relief from judgment under Federal Rule of Civil Procedure 60, which allows courts to “relieve a party . . . from a final judgment” for one of six reasons, including mistake, newly discovered evidence, or fraud. See Fed. R. Civ. P. 60(b)(1)–(6). The case cannot be reopened for any of those reasons, however, because the Court cannot determine whether any of them apply. Nor does Holmes’s argue that the Court’s lack of subject-matter jurisdiction is any less true today than it was in 2022.

CONCLUSION

IT IS THEREFORE RECOMMENDED that Holmes’s Motion to Reopen Case, (Doc. 10), be denied. So recommended. Entered this 23rd day of January 2026. s/ Ronald L. Hanna Ronald L. Hanna United States Magistrate Judge