

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

Voniesha Lashon Woods v. Commissioner of Social Security

Woods · No. 1:25-cv-270 · Decided February 26, 2026

SUMMARY

The United States District Court for the Western District of Michigan approves and adopts a magistrate judge’s report and recommendation concerning Plaintiff’s motion for attorney’s fees under the Equal Access to Justice Act. The court rejects Plaintiff’s objection to the \$204.75 hourly rate and holds that the requested \$246.75 rate is not justified. The court grants the fee motion in part and denies it in part, awarding \$4,699.01 payable directly to Plaintiff.

CASE DETAILS

COURT	United States District Court for the Western District of Michigan, Southern Division
WRITING FOR THE COURT	Robert J. Jonker
JURISDICTION	United States District Court for the Western District of Michigan, Southern Division
DECIDED	February 26, 2026
DOCKET	1:25-cv-270
DISPOSITION	other
PROCEDURAL POSTURE	The district court reviewed de novo Plaintiff's objections to a magistrate judge's Report and Recommendation concerning Plaintiff's motion for attorney's fees under the Equal Access to Justice Act and approved and adopted the recommendation.
STANDARD OF REVIEW	De novo review of the properly objected-to portions of a magistrate judge's recommended disposition under Federal Rule of Civil Procedure 72(b)(3), including review of the evidence before the magistrate judge.
PRECEDENTIAL VALUE	unpublished
PARTIES	Voniesha Lashon Woods v. Commissioner of Social Security

TOPICS

attorney fees

judicial review of agency action

administrative law

civil procedure

PRACTICE AREAS

administrative law

Social Security

attorney fees

civil procedure

QUESTIONS PRESENTED

1. Whether the district court should approve and adopt the magistrate judge's Report and Recommendation after conducting de novo review of Plaintiff's objections.
2. Whether Plaintiff established that an EAJA attorney-fee rate of \$246.75 per hour was justified rather than the \$204.75 per hour rate used in the Western District of Michigan.
3. Whether Plaintiff was entitled to an automatic attorney-fee award under the EAJA merely because she prevailed against the government.

HOLDINGS

1. The district court must conduct de novo review of properly objected-to portions of a magistrate judge's recommended disposition and may accept, reject, or modify the recommendation. After conducting that review, the court approved and adopted the Report and Recommendation.
2. Plaintiff did not establish that a fee rate of \$246.75 per hour was justified. An award of \$204.75 per hour was reasonable under the EAJA in the Western District of Michigan.
3. A prevailing party in an action seeking judicial review of a Social Security decision is not entitled to EAJA attorney's fees as a matter of course or automatically.

KEY QUOTATIONS

“The district judge must determine de novo any part of the magistrate judge’s disposition that has been properly objected to. The district judge may accept, reject, or modify the recommended disposition; receive further evidence; or return the matter to the magistrate judge with instructions.”

“An award of \$204.75 per hour, rather than \$246 per hour, is the reasonable attorney’s fees award under the EAJA in this district.”

FACTUAL BACKGROUND

Plaintiff sought attorney's fees under the Equal Access to Justice Act after obtaining relief in an action for judicial review of a Social Security decision. The magistrate judge recommended using an hourly rate of \$204.75 rather than Plaintiff's requested \$246.75 rate. Plaintiff objected, relying principally on attorney market rates and cost-of-living increases, but did not adequately show that the requested higher rate was justified by the statutory factors.

PROCEDURAL HISTORY

Magistrate Judge Green issued a Report and Recommendation addressing Plaintiff's EAJA attorney-fee motion. Plaintiff objected to the recommended hourly rate of \$204.75 and requested \$246.75 per hour. After de novo

review, the district court found the Report and Recommendation factually sound and legally correct, approved and adopted it, granted the fee motion in part and denied it in part, and ordered payment of \$4,699.01 directly to Plaintiff.

DISPOSITION

other

CASES CITED

- Hill v. Duriron Co., 656 F.2d 1208, 1215 (6th Cir. 1981)
- United States v. 0.376 Acres of Land, 838 F.2d 819 (6th Cir. 1988)
- Caviness v. Comm'r of Soc. Sec., 681 F. App'x 453, 455 (6th Cir. 2017)
- Minor v. Comm'r of Soc. Sec., 826 F.3d 878, 881 (6th Cir. 2016)
- Bryant v. Comm'r of Soc. Sec., 578 F.3d 443, 450 (6th Cir. 2009)
- Garrod v. Comm'r of Soc. Sec., No. 1:25-CV-57, 2025 WL 1665215, at *1 (W.D. Mich. May 28, 2025)
- Vankersen v. Comm'r of Soc. Sec., No. 1:24-CV-909, 2025 WL 1811405, at *1 (W.D. Mich. June 16, 2025)
- Strassburg v. O'Malley, No. 2:23-CV-168, 2024 WL 4132194 (W.D. Mich. July 11, 2024)
- Scharich v. Comm'r of Soc. Sec., No. 1:24-CV-751, 2025 WL 438868 (W.D. Mich. Jan. 23, 2025)
- Meeks v. Comm'r of Soc. Sec., No. 1:24-CV-1001, 2025 WL 1570565 (W.D. Mich. May 19, 2025)
- John S. H. v. Bisignano, No. 2:24-CV-13400, 2025 WL 2901524 (E.D. Mich. Oct. 10, 2025)
- Ayers v. Kijakazi, No. 3:21-CV-213-CRW, 2023 WL 12051747 (E.D. Tenn. Mar. 8, 2023)
- Frank v. O'Malley, No. CV 24-376-EWD, 2025 WL 1202542 (M.D. La. Apr. 25, 2025)
- Johnson v. Comm'r of Soc. Sec., No. 1:14-cv-347 (W.D. Mich. Sept. 21, 2015)