

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Roderick Johnson v. Social Security Administration, et al.

Johnson · No. SAG-25-2465 · Decided April 14, 2026

SUMMARY

The United States District Court for the District of Maryland denied Plaintiff Roderick Johnson's motion for summary judgment and granted Defendants' motion to dismiss or, alternatively, for summary judgment. The court held that no viable Bivens remedy was available against the individual Social Security employee and that sovereign immunity and the Social Security Act's jurisdictional provisions barred constitutional claims against the Social Security Administration. The court further held that Johnson had not exhausted the Social Security Administration's administrative review process and therefore dismissed the action and closed the case.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Stephanie A. Gallagher
JURISDICTION	United States District Court for the District of Maryland
DECIDED	April 14, 2026
DOCKET	SAG-25-2465
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff brought constitutional claims against the Social Security Administration and a federal employee concerning the withholding of benefit payments. Plaintiff moved for summary judgment, and Defendants moved to dismiss or alternatively for summary judgment.
STANDARD OF REVIEW	For a factual Rule 12(b)(1) jurisdictional challenge, dismissal is proper only if the material jurisdictional facts are undisputed and the moving party is entitled to prevail as a matter of law. The court also considered evidence outside the pleadings without converting the jurisdictional motion into one for summary judgment.
PRECEDENTIAL VALUE	nonprecedential district court memorandum opinion
PARTIES	Roderick Johnson v. Social Security Administration, Ms. Betts

TOPICS

subject matter jurisdiction

exhaustion of remedies

judicial review of agency action

motions to dismiss

constitutional law

PRACTICE AREAS

federal civil procedure

Social Security administrative review

constitutional remedies

sovereign immunity

QUESTIONS PRESENTED

1. Whether Plaintiff could maintain a Bivens constitutional damages claim against the federal employee concerning the withholding of Social Security benefits.
2. Whether the United States and the SSA were subject to Plaintiff's constitutional claims despite sovereign immunity and the Social Security Act's channeling of judicial review through 42 U.S.C. § 405(g).
3. Whether the court had subject matter jurisdiction under 42 U.S.C. § 405(g) where Plaintiff had not obtained a final decision from the Commissioner or exhausted the SSA's administrative review process.
4. Whether Plaintiff was entitled to summary judgment.

HOLDINGS

1. Plaintiff could not maintain a Bivens action against Ms. Betts because the alleged withholding of Social Security benefits presented a new context outside the three recognized Bivens contexts, and Congress was better equipped to determine whether a damages remedy should exist.
2. Plaintiff could not assert constitutional claims against the SSA because the United States and its agencies are immune from suit absent a waiver, and the Social Security Act provides the applicable limited waiver and exclusive route for review of claims arising under the Act.
3. The court lacked subject matter jurisdiction because Plaintiff had not received a final decision from the Commissioner and had not exhausted the SSA's four-step administrative review process.

KEY QUOTATIONS

“At present, there are just three contexts in which a private right of action may be properly brought against federal officials for constitutional violations” (Page 1)

“This “new context” standard is “easily satisfied” even if a claim has “significant parallels” to one of the three recognized Bivens contexts.” (Page 2)

“Until that administrative review process has concluded, this Court lacks subject matter jurisdiction to review this matter under 42 U.S.C. § 405(g).” (Page 3)

FACTUAL BACKGROUND

Plaintiff alleged that the SSA and its employee, Ms. Betts, violated his constitutional rights by failing to remit benefit payments owed for a period before his incarceration. Plaintiff sought to receive back pay through his designated payee while incarcerated. The SSA records showed that Plaintiff had not received a final decision from the Commissioner and had not completed the applicable four-step administrative review process.

PROCEDURAL HISTORY

Plaintiff filed the action on January 25, 2025. The court considered Plaintiff's motion for summary judgment and Defendants' motion to dismiss or alternatively for summary judgment. The court dismissed the claims against Ms. Betts under Rule 12(b)(6), dismissed the claims against the SSA under Rule 12(b)(1) for lack of subject matter jurisdiction, denied Plaintiff's motion, granted Defendants' motion, and directed the Clerk to close the case.

DISPOSITION

dismissed

CASES CITED

- *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388, 389, 397 (1971)
- *Rizzo v. Goode*, 423 U.S. 362, 373–77 (1976)
- *Davis v. Passman*, 442 U.S. 228, 248–49 (1979)
- *Carlson v. Green*, 446 U.S. 14, 19 (1980)
- *Mays v. Smith*, 70 F.4th 198, 202 (4th Cir. 2023)
- *Egbert v. Boule*, 596 U.S. 482, 486, 492, 497 n.3 (2022)
- *Goldey v. Fields*, 606 U.S. 942, 942–43 (2025)
- *Ziglar v. Abbasi*, 582 U.S. 120, 147, 149 (2017)
- *F.D.I.C. v. Meyer*, 510 U.S. 471, 475 (1994)
- *Velasco v. Gov't of Indon.*, 370 F.3d 392, 398 (4th Cir. 2004)
- *Evans v. B.F. Perkins Co.*, 166 F.3d 642, 647 (4th Cir. 1999)
- *Richmond, Fredericksburg & Potomac R.R. Co. v. United States*, 945 F.2d 765, 768 (4th Cir. 1991)
- *Roderick J. v. O'Malley*, Civ. No. SAG-23-3019, ECF 25