

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
LOUISIANA

Mary Pierre o/b/o John Clark, Jr. v. Social Security Administration

Pierre · No. 2:25-cv-02557 (Div. 2) · Decided March 23, 2026

SUMMARY

The court grants the Commissioner’s unopposed motion for judgment and remand in a Social Security disability benefits case. It reverses the Administrative Law Judge’s decision and remands the matter under sentence four of 42 U.S.C. § 405(g) for further administrative proceedings.

CASE DETAILS

COURT	United States District Court for the Eastern District of Louisiana
WRITING FOR THE COURT	Donna Phillips Currault
JURISDICTION	United States District Court for the Eastern District of Louisiana
DECIDED	March 23, 2026
DOCKET	2:25-cv-02557 (Div. 2)
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. §§ 405(g) and 1383(c) (3) of the Commissioner's denial of Supplemental Security Income and Disability Insurance Benefits. The Commissioner filed an unopposed motion for judgment and remand under sentence four of 42 U.S.C. § 405(g).
STANDARD OF REVIEW	Under sentence four of 42 U.S.C. § 405(g), the court reviews the Commissioner's decision on the pleadings and transcript of the record and may reverse and remand when the record is insufficient to support the Commissioner's conclusions and further fact-finding is necessary.
PRECEDENTIAL VALUE	unpublished district court order
PARTIES	Mary Pierre o/b/o John Clark, Jr. v. Social Security Administration

TOPICS

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

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the court should grant the Commissioner's unopposed motion for judgment and remand under sentence four of 42 U.S.C. § 405(g).
2. Whether the administrative decision should be reversed and remanded for further administrative proceedings because the record was insufficient to support the Commissioner's conclusions and further fact-finding was necessary.

HOLDINGS

1. A sentence-four remand is appropriate when the record is insufficient to support the Commissioner's conclusions and further fact-finding is necessary; such a remand requires the district court to enter a merits decision reversing, affirming, or modifying the Commissioner's decision before remanding.

KEY QUOTATIONS

“Reversal of the Commissioner’s decision and remand for further proceedings is appropriate under sentence four of 42 U.S.C. § 405(g) when the record is insufficient to support the Commissioner’s conclusions and further fact-finding is necessary.” (II)

“A sentence four remand requires the district court to enter a decision on the merits before remanding a case to the Commissioner.” (II)

FACTUAL BACKGROUND

John Clark, Jr. filed applications for SSI and DIB alleging disability beginning September 1, 2021. The Commissioner denied the applications initially and on reconsideration, and an ALJ later issued an unfavorable decision. The Appeals Council denied review, after which Plaintiff sought judicial review; the Commissioner conceded, through the unopposed remand motion, that further administrative proceedings were appropriate.

PROCEDURAL HISTORY

John Clark, Jr. applied for SSI and DIB, and the applications were denied initially and on reconsideration. After an unfavorable decision by ALJ Jim Frasier and denial of review by the Appeals Council, Plaintiff filed this action. The Commissioner answered and filed the administrative record, then moved without opposition for reversal and sentence-four remand for a new administrative hearing and decision.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The case is remanded to the Commissioner for further administrative proceedings, including a new administrative hearing and decision, pursuant to sentence four of 42 U.S.C. § 405(g).

CASES CITED

- Melkonyan v. Sullivan, 501 U.S. 89, 98 (1991)
- Shalala v. Schaefer, 509 U.S. 292, 297-98 (1993)
- Sullivan v. Finkelstein, 496 U.S. 617, 625-26 (1990)

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