

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
ARKANSAS, CENTRAL DIVISION

Kareem Tavares Martin v. Commissioner, Social Security
Administration

Martin · No. 4:24-cv-00978-LPR · Decided January 16, 2026

SUMMARY

The United States District Court for the Eastern District of Arkansas adopted the magistrate judge’s Recommended Disposition without objection. The court reversed the Commissioner of Social Security’s decision and remanded the case for further proceedings under sentence four of 42 U.S.C. § 405(g).

CASE DETAILS

COURT	United States District Court for the Eastern District of Arkansas, Central Division
WRITING FOR THE COURT	Lee P. Rudofsky
JURISDICTION	United States District Court for the Eastern District of Arkansas, Central Division
DECIDED	January 16, 2026
DOCKET	4:24-cv-00978-LPR
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	The district court reviewed a Recommended Disposition concerning the Commissioner's Social Security decision. No objections were filed, and the court adopted the Recommended Disposition, reversed the Commissioner's decision, and remanded for further proceedings.
STANDARD OF REVIEW	De novo review of the Recommended Disposition; the court applied the harmless-error burden requiring the claimant to show that an alleged error was not harmless.
PRECEDENTIAL VALUE	Unpublished district court order; precedential status is not stated in the source.
PARTIES	Kareem Tavares Martin v. Commissioner, Social Security Administration

TOPICS

judicial review of agency action

administrative law

remedies

civil procedure

PRACTICE AREAS

Social Security

administrative law

judicial review

civil procedure

remedies

QUESTIONS PRESENTED

1. Whether the district court should approve and adopt the magistrate judge's Recommended Disposition after the objection period expired without objections.
2. Whether the Commissioner's Social Security decision should be reversed and remanded under sentence four of 42 U.S.C. § 405(g) because the claimant demonstrated that an error was not harmless.

HOLDINGS

1. The court approved and adopted the Recommended Disposition in its entirety as the court's findings and conclusions.
2. The claimant met the threshold of showing that the error was not harmless, warranting reversal of the Commissioner's decision.
3. The Commissioner's decision was reversed and the case was remanded for further proceedings as a sentence-four remand under 42 U.S.C. § 405(g).

KEY QUOTATIONS

“IT IS THEREFORE ORDERED THAT the Commissioner’s decision is REVERSED, and this case is REMANDED for further proceedings.” (at 1)

“This is a “sentence four” remand within the meaning of 42 U.S.C. § 405(g) and Melkonyan v. Sullivan, 501 U.S. 89 (1991).” (at 1)

FACTUAL BACKGROUND

The Commissioner issued a decision adverse to Kareem Tavares Martin in a Social Security matter. The Recommended Disposition concluded that the claimant had met the threshold for showing that an error was not harmless. The district court adopted that disposition and ordered further administrative proceedings.

PROCEDURAL HISTORY

United States Magistrate Judge Benecia B. Moore issued a Recommended Disposition. After the objection period expired without objections, District Judge Lee P. Rudofsky conducted a de novo review, approved and adopted the Recommended Disposition in its entirety, reversed the Commissioner's decision, and remanded the case under sentence four of 42 U.S.C. § 405(g).

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The case is remanded to the Commissioner for further proceedings consistent with the adopted Recommended Disposition.

CASES CITED

- Byes v. Astrue, 687 F.3d 913, 917 (8th Cir. 2012)
- Melkonyan v. Sullivan, 501 U.S. 89 (1991)

OPINION

Martin

PER CURIAM.

IN THE UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF ARKANSAS

CENTRAL DIVISION

KAREEM TAVARES MARTIN PLAINTIFF

Case No. 4:24-cv-00978-LPR

COMMISSIONER, SOCIAL

SECURITY ADMINISTRATION DEFENDANT

ORDER

The Court has reviewed the Recommended Disposition (RD) submitted by United States Magistrate Judge Benecia B. Moore (Doc. 12). No objections have been filed, and the time for doing so has passed. After a de novo review of the RD and careful consideration of the case record, the Court concludes that the RD should be, and hereby is, approved and adopted in its entirety as this Court's findings and conclusions in all respects.! IT IS THEREFORE ORDERED THAT the Commissioner's decision is REVERSED, and this case is REMANDED for further proceedings. This is a "sentence four" remand within the meaning of 42 U.S.C. § 405(g) and Melkonyan v. Sullivan, 501 U.S. 89 (1991). DATED this 16th day of January 2026.

LEE P. RUDOFISKY

UNITED STATES DISTRICT JUDGE

' The Court acknowledges that the burden of proof and persuasion is on the claimant to show an error was not harmless. See Byes vy. Astrue, 687 F.3d 913, 917 (8th Cir. 2012) ("To show an error was not harmless, [the claimant] must provide some indication that the ALJ would have decided differently if the error had not occurred."). For essentially the reasons explained in the RD at pages 11-14, the claimant has (just) met this threshold. Nonetheless, the Court wants to make clear that

it, like the RD, is not at all certain that, ultimately, the ALJ's new decision will have a different result than the current decision.

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