

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
ARKANSAS, HARRISON DIVISION

Steven L. Maylee v. Frank Bisignano, Commissioner, Social Security
Administration

Maylee · No. 25-3082 · Decided April 10, 2026

SUMMARY

The United States District Court for the Western District of Arkansas granted an unopposed motion to remand Steven L. Maylee's action seeking review of the denial of supplemental security income benefits. The court remanded the case for further administrative proceedings under sentence four of 42 U.S.C. § 405(g).

CASE DETAILS

COURT	United States District Court for the Western District of Arkansas, Harrison Division
WRITING FOR THE COURT	Christy Comstock
JURISDICTION	United States District Court for the Western District of Arkansas, Harrison Division
DECIDED	April 10, 2026
DOCKET	25-3082
DISPOSITION	remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's denial of supplemental security income benefits. The Commissioner filed an unopposed motion for a sentence-four remand for further administrative proceedings.
PRECEDENTIAL VALUE	unpublished district court memorandum opinion
PARTIES	Steven L. Maylee v. Frank Bisignano, Commissioner, Social Security Administration

TOPICS

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

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the district court should remand the Social Security case for further administrative proceedings under sentence four of 42 U.S.C. § 405(g).
2. Whether the requested remand was authorized under the exclusive remand mechanisms provided by 42 U.S.C. § 405(g).

HOLDINGS

1. A district court may remand a Social Security case under sentence four of 42 U.S.C. § 405(g) by entering judgment affirming, modifying, or reversing the Commissioner's decision, with or without remanding the matter for a rehearing.

KEY QUOTATIONS

“[t]he court shall have power to enter, upon the pleadings and transcript of the record, a judgment affirming, modifying, or reversing the decision of the Commissioner of Social Security, with or without remanding the cause for a rehearing.”

FACTUAL BACKGROUND

Plaintiff applied for supplemental security income benefits under Title XVI of the Social Security Act. The Commissioner denied the application, leading Plaintiff to seek judicial review under 42 U.S.C. § 405(g).

PROCEDURAL HISTORY

Maylee filed an action challenging the denial of his application for supplemental security income benefits. The Commissioner filed the administrative transcript and then moved, without opposition, for remand under sentence four of 42 U.S.C. § 405(g). The district court granted the requested remand for further administrative action.

DISPOSITION

remanded

REMAND INSTRUCTIONS

Remand pursuant to sentence four of 42 U.S.C. § 405(g) for further administrative action and proceedings.

CASES CITED

- Shalala v. Schaefer, 509 U.S. 292, 296 (1993)

OPINION

IN THE UNITED STATES DISTRICT COURT WESTERN DISTRICT OF ARKANSAS
HARRISON DIVISION STEVEN L. MAYLEE PLAINTIFF v. CIVIL NO. 25-3082 FRANK

BISIGNANO, Commissioner Social Security Administration DEFENDANT MEMORANDUM OPINION Plaintiff, Steven L. Maylee, brings this action pursuant to 42 U.S.C. § 405(g) seeking judicial review of a decision of the Commissioner of the Social Security Administration (Commissioner) denying his application for supplemental security income (SSI) benefits under the provisions of Titles XVI of the Social Security Act (Act).

(ECF No. 2). The Defendant filed the administrative transcript on February 12, 2026. (ECF No. 10). On April 10, 2026, the Commissioner filed an unopposed motion to remand Plaintiff's case pursuant to "sentence four" of section 405(g) in order to conduct further administrative proceedings. (ECF No. 13).

The exclusive methods by which a district court may remand a social security case to the Commissioner are set forth in "sentence four" and "sentence six" of 42 U.S.C. § 405(g). A remand pursuant to "sentence six" is limited to two situations: where the Commissioner requests a remand before answering the complaint, or where the court orders the Commissioner to consider new, material evidence that was for good cause not presented before the agency.

The fourth sentence of the statute provides that "[t]he court shall have power to enter, upon the pleadings and transcript of the record, a judgment affirming, modifying, or reversing the decision of the Commissioner of Social Security, with or without remanding the cause for a rehearing." 42 U.S.C. § 405(g); *Shalala v. Schaefer*, 509 U.S. 292, 296 (1993). Based on the foregoing, the Court finds appropriate remand for further administrative action pursuant to "sentence four" of section 405(g).

DATED this 10th day of April 2026. /s/_(Asssty Comateck CHRISTY COMSTOCK UNITED STATES MAGISTRATE JUDGE