

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
ALABAMA, SOUTHERN DIVISION

Sandranette Renice Washington v. Frank Bisignano, Commissioner
of Social Security

Washington v. Bisignano · No. 2:25-cv-1927-HDM · Decided March 4, 2026

SUMMARY

The United States District Court for the Northern District of Alabama grants the Commissioner of Social Security’s uncontested motion for entry of judgment with remand. Pursuant to sentence four of 42 U.S.C. § 405(g), the court reverses the decision denying benefits and remands the matter for further administrative proceedings, including an additional hearing and a new decision.

CASE DETAILS

COURT	United States District Court for the Northern District of Alabama, Southern Division
JURISDICTION	United States District Court for the Northern District of Alabama, Southern Division
DECIDED	March 4, 2026
DOCKET	2:25-cv-1927-HDM
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Social Security claimant appealed a final administrative decision denying benefits. The Commissioner moved for entry of judgment under sentence four of 42 U.S.C. § 405(g), requesting reversal and remand for further administrative proceedings. The motion was uncontested.
STANDARD OF REVIEW	Under sentence four of 42 U.S.C. § 405(g), the court may enter judgment affirming, modifying, or reversing the Commissioner's decision, with or without remand for a rehearing, based on the pleadings and administrative transcript.
PRECEDENTIAL VALUE	Unknown
PARTIES	Sandranette Renice Washington v. Frank Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

remedies

civil procedure

PRACTICE AREAS

Social Security

administrative law

judicial review

QUESTIONS PRESENTED

1. Whether the court should grant the Commissioner's uncontested motion for reversal and remand under sentence four of 42 U.S.C. § 405(g).
2. Whether a separate final judgment is required when a Social Security case is reversed and remanded under sentence four.

HOLDINGS

1. Reversal and remand under sentence four of 42 U.S.C. § 405(g) was appropriate, and the Commissioner's uncontested motion for entry of judgment with remand was granted.
2. When a Social Security appeal is reversed and remanded under sentence four of 42 U.S.C. § 405(g), the court must enter a separate final judgment.

KEY QUOTATIONS

“Under sentence four, the court has the “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

Washington sought Social Security benefits, but the Commissioner issued a final administrative decision denying her claim. Washington filed a judicial appeal. The Commissioner sought reversal and remand so that Washington could receive an additional hearing and the Social Security Administration could issue a new decision, and Washington did not oppose the request.

PROCEDURAL HISTORY

Washington filed an appeal challenging the Commissioner's final administrative decision denying her claim. The Commissioner filed the certified administrative transcript and moved for sentence-four reversal and remand. The district court granted the uncontested motion, reversed the Commissioner's decision, remanded for further administrative proceedings, and stated that a separate final judgment would be entered.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Commissioner's final decision denying benefits is reversed. The matter is remanded for further administrative proceedings, including an additional hearing and issuance of a new decision by the Social Security Administration. A separate final judgment is to be entered.

CASES CITED

- *Shalala v. Schaefer*, 509 U.S. 292, 297 (1993)
- *Allen v. Soc. Sec. Admin.*, No. 7:22-cv-374, 2025 WL 1688615, at *1 (N.D. Ala. June 16, 2025)

OPINION

Sandranette Renice Washington v. Frank Bisignano, Commissioner of Social Security

PER CURIAM.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF ALABAMA

SOUTHERN DIVISION

SANDRANETTE RENICE

WASHINGTON,

Plaintiff, v. Case No.: 2:25-cv-1927-HDM

COMMISSIONER OF SOCIAL

SECURITY,

Defendant.

MEMORANDUM OPINION AND ORDER

Plaintiff Sandranette Renice Washington filed this Social Security appeal to contest “a final administrative decision denying [her] claim.” (Doc. 1, ¶ 2). Defendant Frank Bisignano, Commissioner of the Social Security Administration, filed the certified transcript of Washington’s claim, (doc. 7), and now seeks an entry of judgment under sentence four of 42 U.S.C. § 405(g), with reversal and remand of the case for further administrative proceedings, (doc. 12). Upon remand, Washington—who does not oppose the motion—will have “an opportunity for an additional hearing and [the Social Security Administration will] issue a new decision.” *Id.* at 1. Under sentence four, the court has the “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). When a court reverses and remands a Social Security appeal under sentence four, it must enter a separate final judgment. *Shalala v. Schaefer*, 509 U.S. 292, 297 (1993); *Allen v. Soc. Sec. Admin.*, No. 7:22-cv-374, 2025 WL 1688615, at *1 (N.D. Ala. June 16, 2025). The court finds that a reversal and remand under sentence four is appropriate. Accordingly, Defendant Commissioner Frank Bisignano’s Uncontested Motion for Entry of Judgment With Remand, (doc. 12), is GRANTED. Pursuant to sentence four of 42 U.S.C. § 405(g), the Commissioner’s final decision denying benefits to Plaintiff Sandranette Renice Washington is REVERSED and this matter is REMANDED for further administrative proceedings. The court will enter a separate final

judgment. DONE and ORDERED on March 4, 2026

(AOA

UNITED STATES DISTRICT JUDGE

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