

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Martinez v. Commissioner of Social Security

Martinez · No. 1:25-cv-00375-CDB (SS) · Decided April 2, 2025

SUMMARY

The United States District Court for the Eastern District of California granted Erin Martinez’s application to proceed in forma pauperis in an action seeking review of the Commissioner of Social Security’s denial of disability benefits. The court found the complaint timely and cognizable under 42 U.S.C. § 405(g) and directed the clerk to issue a summons, scheduling order, and consent or reassignment documents.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	April 2, 2025
DOCKET	1:25-cv-00375-CDB (SS)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff filed an action seeking review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying disability benefits and moved to proceed in forma pauperis.
STANDARD OF REVIEW	At the in forma pauperis screening stage, the court must dismiss a complaint that is frivolous, malicious, fails to state a claim, or seeks monetary relief from an immune defendant. The court also considered whether the complaint stated a cognizable claim for judicial review and whether the action was timely under 42 U.S.C. § 405(g).
PARTIES	Erin Martinez v. Commissioner of Social Security

QUESTIONS PRESENTED

- Whether Plaintiff satisfied the requirements to proceed in forma pauperis under 28 U.S.C. § 1915(a).
- Whether the complaint was subject to dismissal under the in forma pauperis screening provisions of 28 U.S.C. § 1915.
- Whether the complaint timely and sufficiently invoked jurisdiction for judicial review of the Commissioner's final decision under 42 U.S.C. § 405(g).

HOLDINGS

1. Plaintiff satisfied the requirements of 28 U.S.C. § 1915(a), and the application to proceed in forma pauperis should be granted.
2. The complaint states a cognizable claim for review of the Commissioner's administrative decision and is not subject to dismissal at this stage under 28 U.S.C. § 1915.
3. The action was timely and the court has jurisdiction because Plaintiff filed within the applicable sixty-day period after the Appeals Council's January 30, 2025 denial and alleged residence in Kern County, California.

KEY QUOTATIONS

“The Court may authorize the commencement of an action without prepayment of fees “by a person who submits an affidavit that includes a statement of all assets such person...possesses (and) that the person is unable to pay such fees or give security therefor.”” (at 1)

“Any individual after any final decision of the Commissioner made after a hearing to which he was a party, irrespective of the amount in controversy, may obtain a review of such decision by a civil action commenced within sixty” (at 3)

FACTUAL BACKGROUND

Erin Martinez sought Social Security disability benefits, but the Administrative Law Judge denied the claim. The Appeals Council denied review on January 30, 2025. Martinez filed a complaint in the Eastern District of California on March 31, 2025, claimed residence in Kern County, California, and sought to proceed without paying the filing fee.

PROCEDURAL HISTORY

The Appeals Council denied Plaintiff's request for review of the Administrative Law Judge's decision on January 30, 2025. Plaintiff filed this action on March 31, 2025, within the applicable filing period, and submitted an application to proceed in forma pauperis. The court found the complaint cognizable, granted the application, and directed the Clerk to issue the summons, scheduling order, and reassignment documents.

DISPOSITION

other