

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Megan Elizabeth Waugh v. Commissioner of Social Security

Waugh v. Commissioner of Social Security, No. 1:26-cv-00086-CDB (SS) (E.D. Cal. Jan. 7, 2026) · No. 1:26-cv-00086-CDB (SS) · Decided January 7, 2026

SUMMARY

The United States District Court for the Eastern District of California grants Megan Elizabeth Waugh’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 finds that the complaint is timely, states a cognizable claim, and invokes jurisdiction under 42 U.S.C. § 405(g). The clerk is directed 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	January 7, 2026
DOCKET	1:26-cv-00086-CDB (SS)
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff filed an action under 42 U.S.C. § 405(g) seeking judicial review of the Commissioner's final decision denying disability benefits and sought leave to proceed in forma pauperis. The court granted the application, found the complaint timely and cognizable, and directed issuance of summons and case-management documents.
STANDARD OF REVIEW	Under 42 U.S.C. § 405(g), the district court may review the Commissioner's final decision on the administrative record and may affirm, modify, reverse, or remand it. The merits standard of review was not reached in this order.
PRECEDENTIAL VALUE	unpublished district court order; nonprecedential
PARTIES	Megan Elizabeth Waugh v. Commissioner of Social Security

TOPICS

- judicial review of agency action
- administrative law
- subject matter jurisdiction
- pleadings
- civil procedure

PRACTICE AREAS

Social Security

Administrative Law

Federal Civil Procedure

QUESTIONS PRESENTED

1. Whether Plaintiff satisfied the financial requirements to proceed in forma pauperis under 28 U.S.C. § 1915(a).
2. Whether the complaint was timely and within the district court's jurisdiction under 42 U.S.C. § 405(g).
3. Whether the complaint stated a cognizable claim for judicial review of the Commissioner's decision.

HOLDINGS

1. Plaintiff satisfied the requirements of 28 U.S.C. § 1915(a) and was permitted to commence the action without prepayment of the filing fee.
2. The complaint was timely, and the court had jurisdiction under 42 U.S.C. § 405(g), because Plaintiff filed within the Appeals Council's stated appeal period and alleged residence within the district.
3. The complaint stated a cognizable claim for review of the administrative decision denying Social Security benefits and supplemental income.

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)

“Plaintiff's complaint states a cognizable claim for review of the administrative decision denying Social Security benefits and supplemental income.” (at 4)

FACTUAL BACKGROUND

The Commissioner denied Plaintiff's claim for disability insurance benefits and supplemental income. The Appeals Council denied review on November 14, 2025, and allowed 60 days plus five days for mailing to seek judicial review. Plaintiff, who alleged residence in Bakersfield, California, filed the complaint on January 6, 2026, and submitted a financial affidavit seeking in forma pauperis status.

PROCEDURAL HISTORY

The Administrative Law Judge denied Plaintiff's claim for benefits. On November 14, 2025, the Appeals Council denied Plaintiff's request for review. Plaintiff filed this action on January 6, 2026, and submitted an application to proceed in forma pauperis. The district court granted the application and ordered the Clerk to issue a summons, scheduling order, and consent or reassignment documents.

DISPOSITION

other

CASES CITED

- Denton v. Hernandez, 504 U.S. 25, 32-33 (1992)
- Swierkiewicz v. Sorema N.A., 534 U.S. 506, 512 (2002)
- Ashcroft v. Iqbal, 556 U.S. 662, 678-79 (2009)
- Ivey v. Board of Regents, 673 F.2d 266, 268 (9th Cir. 1982)
- Bell Atlantic Corp. v. Twombly, 550 U.S. 544, 556, 570 (2007)
- Lopez v. Smith, 203 F.3d 1122, 1127-28 (9th Cir. 2000) (en banc)

OPINION

1 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT 9 EASTERN DISTRICT OF
CALIFORNIA 10 11 MEGAN ELIZABETH WAUGH, Case No. 1:26-cv-00086-CDB (SS) 12
Plaintiff, ORDER GRANTING APPLICATION TO PROCEED IN FORMA PAUPERIS AND 13
v. DIRECTING CLERK OF THE COURT TO ISSUE SUMMONS, SCHEDULING ORDER, 14
COMMISSIONER OF SOCIAL AND CONSENT OR REQUEST FOR SECURITY,
REASSIGNMENT DOCUMENTS 15 Defendant.

(Doc. 2) 16 17 18 Plaintiff Megan Elizabeth Waugh (“Plaintiff”) initiated this action with the filing
of a 19 complaint on January 6, 2026, seeking review of the final decision of the Commissioner of
Social 20 Security denying disability insurance and benefits. (Doc. 1). Plaintiff did not pay the
filing fee and 21 instead filed an application to proceed in forma pauperis (“IFP”) pursuant to 28
U.S.C. § 1915.

22 (Doc. 2). For the following reasons, the Court finds issuance of the new case documents and 23
Plaintiff’s application to proceed in forma pauperis appropriate. 24 I. Proceeding In Forma
Pauperis 25 The Court may authorize the commencement of an action without prepayment of fees
“by 26 a person who submits an affidavit that includes a statement of all assets such [person]
possesses 27 [and] that the person is unable to pay such fees or give security therefor.” 28 U.S.C. §
1915(a).

Here, the Court has reviewed Plaintiff’s application and financial status affidavit (Doc. 2) and
finds 1 the requirements of 28 U.S.C. § 1915(a) are satisfied. 2 II. Screening Requirement 3 When
a party seeks to proceed in forma pauperis, the Court is required to review the 4 complaint and
shall dismiss the complaint, or portion thereof, if it is “frivolous, malicious or fails 5 to state a
claim upon which relief may be granted; or ... seeks monetary relief from a defendant 6 who is
immune from such relief.” 28 U.S.C. §§ 1915(b) & (e)(2).

A plaintiff’s claim is frivolous 7 “when the facts alleged rise to the level of the irrational or the
wholly incredible, whether or not 8 there are judicially noticeable facts available to contradict
them.” Denton v. Hernandez, 504 U.S. 9 25, 32-33 (1992). 10 III. Pleading Standards 11 A
complaint must include a statement affirming the court’s jurisdiction, “a short and plain 12

statement of the claim showing the pleader is entitled to relief; and a demand for the relief sought, 13 which may include relief in the alternative or different types of relief.” Fed.

R. Civ. P. 8(a). The 14 purpose of the complaint is to give the defendant fair notice of the claims, and the grounds upon 15 which the complaint stands. *Swierkiewicz v. Sorema N.A.*, 534 U.S. 506, 512 (2002). As set forth 16 by the Supreme Court, Rule 8: 17 ... does not require detailed factual allegations, but it demands more than an unadorned, the-defendant-unlawfully-harmed-me accusation.

A pleading that offers 18 labels and conclusions or a formulaic recitation of the elements of a cause of action will not do. Nor does a complaint suffice if it tenders naked assertions devoid of 19 further factual enhancement. 20 *Ashcroft v. Iqbal*, 556 U.S. 662, 678-79 (2009) (internal quotation marks and citations omitted). 21 Vague and conclusory allegations do not support a cause of action.

Ivey v. Board of Regents, 673 22 F.2 266, 268 (9th Cir. 1982). The *Iqbal* Court clarified further, 23 [A] complaint must contain sufficient factual matter, accepted as true, to “state a claim to relief that is plausible on its face.” *Bell Atl. Corp. v. Twombly*, 550 U.S. 24 544, 570 (2009). A claim has facial plausibility when the plaintiff pleads factual content that allows the court to draw the reasonable inference that the defendant is 25 liable for the misconduct alleged.

Id. at 556. The plausibility standard is not akin to a “probability requirement,” but it asks for more than a sheer possibility that a 26 defendant has acted unlawfully. *Id.* Where a complaint pleads facts that are “merely consistent with” a defendant’s liability, it “stops short of the line between possibility 27 a nd plausibility of “entitlement to relief.” 1 and determine whether the facts would make the plaintiff entitled to relief; legal conclusions are 2 not entitled to the same assumption of truth.

Id. The Court may grant leave to amend a complaint 3 to the extent deficiencies of the complaint can be cured by an amendment. *Lopez v. Smith*, 203 4 F.3d 1122, 1127-28 (9th Cir. 2000) (en banc). 5 IV. Discussion and Analysis 6 Plaintiff seeks review of a decision by the Commissioner of Social Security denying 7 disability benefits. (Doc. 1).

The Court may have jurisdiction pursuant to 42 U.S.C. § 405(g), 8 which provides: 9 Any individual after any final decision of the Commissioner made after a hearing to which he was a party, irrespective of the amount 10 in controversy, may obtain a review of such decision by a civil action commenced within sixty days after the mailing to him of such 11 decision or within such further time as the Commissioner may allow.

Such action shall be brought in the district court of the United 12 States for the judicial district in which the plaintiff resides or has his principal place of business...The court shall have power to enter, 13 upon the pleadings and transcript of the record, a judgment affirming, modifying, or

reversing the decision of the Commissioner 14 of Social Security, with or without remanding the cause for a rehearing.

15 16 Id. Except as provided by statute, “[n]o findings of fact or decision of the Commissioner shall be 17 reviewed by any person, tribunal, or governmental agency.” 42 U.S.C. § 405(h). 18 On November 14, 2025, the Appeals Council denied Plaintiff’s request for review of the 19 decision of the Administrative Law Judge denying Plaintiff’s claim for benefits.

(Doc. 1 ¶ 10). 20 The Appeals Council gave Plaintiff 60 days, plus five (5) days for delivery by mail, from the date 21 of the notice to file an appeal for judicial review of the Commissioner’s final decision in federal 22 district court. See id. On January 6, 2026, Plaintiff filed a complaint in this Court seeking judicial 23 review of the Commissioner’s final decision.

See id. Thus, Plaintiff’s complaint is timely. Plaintiff 24 claims residency in Bakersfield, California. Id. ¶ 1. Therefore, the Court has jurisdiction over this 25 action. 26 /// 27 /// 1} V. Conclusion and Order 2 Plaintiff’s complaint states a cognizable claim for review of the administrative decision 3 | denying Social Security benefits and supplemental income.

Accordingly, IT IS HEREBY 4 | ORDERED that Plaintiff’s application to proceed in forma pauperis (Doc. 2) is GRANTED. The 5 | Clerk of Court is directed to issue the following: 1) a Summons; 2) the Scheduling Order; 3) the 6 | Order re Consent or Request for Reassignment; and 4) a Consent to Assignment or Request for 7 | Reassignment form. 8 | SO ORDERED.? Dated: _ January 7, 2026 | Ww Vv Ry 10 UNITED STATES MAGISTRATE JUDGE 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28