

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Billy J. Stafford v. Commissioner of Social Security

Stafford · No. 1:25-cv-00835-EPG · Decided January 16, 2026

SUMMARY

The United States District Court for the Eastern District of California denied Billy J. Stafford’s motion for summary judgment and dismissed his complaint for lack of exhaustion. The court held that the Appeals Council did not abuse its discretion by dismissing Stafford’s request for review as untimely, because he filed it more than five months after the deadline and provided no corroborating evidence that he received the administrative law judge’s decision late. The court directed the Clerk to enter judgment for the Commissioner and close the case.

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 16, 2026
DOCKET	1:25-cv-00835-EPG
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the dismissal by the Social Security Appeals Council of his untimely request for review of an administrative law judge's denial of supplemental security income benefits. The parties consented to final judgment by a United States Magistrate Judge. Plaintiff moved for summary judgment.
STANDARD OF REVIEW	The court reviews the Appeals Council's dismissal of an untimely request for review for abuse of discretion as to the overall conclusion and substantial evidence as to any underlying fact.
PRECEDENTIAL VALUE	unknown
PARTIES	Billy J. Stafford v. Commissioner of Social Security

TOPICS

judicial review of agency action

exhaustion of remedies

administrative law

standard of review

summary judgment

PRACTICE AREAS

social security

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the federal court had jurisdiction to review the Appeals Council's dismissal of Plaintiff's request for review as untimely.
2. Whether the Appeals Council abused its discretion by dismissing Plaintiff's request for review as untimely after Plaintiff failed to rebut the five-day receipt presumption or establish good cause for an extension.
3. Whether the court could reach the merits of Plaintiff's challenge to the ALJ's disability determination despite the Appeals Council's procedural dismissal.

HOLDINGS

1. The Appeals Council's dismissal of an untimely request for review constitutes a final decision made after a hearing under 42 U.S.C. § 405(g), giving the federal court jurisdiction to review the dismissal.
2. In the ordinary case, the court must restrict its review to the procedural ground on which the Appeals Council dismissed the request and should not decide the underlying disability merits before the agency has had an opportunity to address them.
3. The Appeals Council did not abuse its discretion by dismissing Plaintiff's request for review because the request was filed after the 60-day deadline plus the five-day receipt period, and Plaintiff presented no corroborating evidence rebutting the receipt presumption or establishing good cause.

KEY QUOTATIONS

"Accordingly, in an ordinary case, a court should restrict its review to the procedural ground that was the basis for the Appeals Council dismissal and (if necessary) allow the agency to address any residual substantive questions in the first instance." (587 U.S. at 488)

FACTUAL BACKGROUND

Plaintiff applied for supplemental security income benefits in 2021 and appeared at the administrative hearing without representation. The ALJ attempted to obtain medical records from Loma Linda Hospital but received a response indicating that there was no record of treatment, and Plaintiff did not show that he submitted the records. The ALJ denied benefits on July 24, 2024. Plaintiff requested Appeals Council review on March 3, 2025, asserting that he did not receive the ALJ's decision until January 30, 2025, but he provided no corroborating evidence and did not respond to the Appeals Council's request for a statement of good cause.

PROCEDURAL HISTORY

The ALJ denied Plaintiff's supplemental security income application on July 24, 2024. Plaintiff requested Appeals Council review on March 3, 2025, more than five months after the applicable deadline; the Appeals Council dismissed the request as untimely and found no good cause to extend the filing period. Plaintiff then filed this action, and after an extension of time filed a motion for summary judgment. The court denied the motion and dismissed the complaint for lack of exhaustion.

DISPOSITION

dismissed

CASES CITED

- Smith v. Berryhill, 587 U.S. 471 (2019)
- INS v. Orlando Ventura, 537 U.S. 12 (2002) (per curiam)
- ICC v. Locomotive Engineers, 482 U.S. 270 (1987)
- SEC v. Chenery Corp., 318 U.S. 80 (1943)
- City of New York, 476 U.S. at 485, 106 S.Ct. 2022
- Salfi, 422 U.S. at 765, 95 S.Ct. 2457
- Ward v. Saul, No. 1:19-CV-1555-JLT, 2020 WL 1532274, at *4 (E.D. Cal. Mar. 31, 2020)
- Matlock v. Bowen, No. C-85-6072-MHP, 1988 WL 252440, at *4 (N.D. Cal. Dec. 19, 1988)

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