

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Aaron Christopher Widick v. Commissioner of Social Security

Widick · No. 1:25-cv-00406-HBK · Decided July 7, 2025

SUMMARY

The United States District Court for the Eastern District of California granted the parties’ stipulated motion to remand under sentence four of 42 U.S.C. § 405(g) and reversed the Commissioner of Social Security’s final decision. The case was remanded for further administrative proceedings, including reevaluation of the severity of the plaintiff’s mental impairments and development of the record as necessary.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Helena M. Barch-Kuchta
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	July 7, 2025
DOCKET	1:25-cv-00406-HBK
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	The parties jointly moved to remand the Social Security case for further administrative proceedings under sentence four of 42 U.S.C. § 405(g).
PRECEDENTIAL VALUE	Unpublished district court order; precedential status is unknown.
PARTIES	Aaron Christopher Widick v. Commissioner of Social Security

TOPICS

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

PRACTICE AREAS

- Social Security
- administrative law
- federal civil procedure

QUESTIONS PRESENTED

1. Whether the court should grant the parties' stipulated motion to remand under sentence four of 42 U.S.C. § 405(g).
2. What proceedings the Commissioner must conduct on remand.

HOLDINGS

1. The court may remand a Social Security case under sentence four of 42 U.S.C. § 405(g) while reversing the Commissioner's final decision.
2. The parties' joint motion to remand is granted, the Commissioner's final decision is reversed, and the case is remanded for further administrative proceedings.

KEY QUOTATIONS

“The Melkonyan court recognized 42 U.S.C. § 405(g) contemplates only two types of remand — sentence four or sentence six.” (at 1)

“A sentence four remand authorizes a court to enter “a judgment affirming, modifying, or reversing the decision of the Secretary, with or without resetting the cause for a rehearing.”” (at 1)

FACTUAL BACKGROUND

The case concerned the Commissioner's final decision regarding plaintiff's Social Security claim. The parties agreed that further administrative proceedings were necessary, including reevaluation of the severity of plaintiff's mental impairments and, as necessary, further development of the record.

PROCEDURAL HISTORY

Plaintiff challenged the Commissioner's final decision in federal district court. The parties stipulated that the case should be remanded for further administrative proceedings, and the court granted the motion, reversed the Commissioner's decision, entered judgment for plaintiff, and closed the case.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Commissioner must reevaluate the severity of plaintiff's mental impairments, take any action necessary to further develop the record, as necessary, and issue a new decision.

CASES CITED

- Melkonyan v. Sullivan, 501 U.S. 89, 97-98 (1991)

OPINION

1 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT 9 FOR THE EASTERN DISTRICT OF
CALIFORNIA 10 11 AARON CHRISTOPHER WIDICK, Case No. 1:25-cv-00406-HBK 12
Plaintiff, ORDER GRANTING PARTIES' STIPULATED MOTION TO REMAND 13 v. UNDER
SENTENCE FOUR OF 42 U.S.C. § 405(g), REVERSING FINAL DECISION AND 14
COMMISSIONER OF SOCIAL REMANDING CASE1 SECURITY, 15 (Doc. No. 13)
Defendant.

16 17 18 Pending before the Court is the parties' joint motion to remand filed July 7, 2025. (Doc.
19 No. 12). Plaintiff Aaron Christopher Widick and the Commissioner of Social Security agree
that 20 this case should be remanded for further administrative proceedings under sentence four of
42 21 U.S.C. § 405(g). (Id.). 22 The United States Supreme Court held that the Social Security Act
permits remand in 23 conjunction with a judgment either affirming, reversing, or modifying the
Secretary's decision.

24 See *Melkonyan v. Sullivan*, 501 U.S. 89, 97-98 (1991) (addressing issue of attorney's fees
under 25 the Equal Access to Justice Act and calculating deadline using date of final judgment).
The 26 1 Both parties have consented to the jurisdiction of a magistrate judge in accordance with
28 U.S.C. 27 §636(c)(1). (Doc. No. 10). 28 1 | *Melkonyan* court recognized 42 U.S.C. § 405(g)
contemplates only two types of remand — 2 || sentence four or sentence six.

Jd. at 98. A sentence four remand authorizes a court to enter “a 3 | judgment affirming, modifying,
or reversing the decision of the Secretary, with or without 4 || resetting the cause for a rehearing.”
Jd. (other citations omitted). 5 The Court grants the parties' motion to remand under sentence four
and reverses the 6 | Commissioner's final decision.

As agreed by the parties, upon remand, the Commissioner will 7 | reevaluate the severity of
Plaintiff's mental impairments; take any action necessary to further 8 | develop the record, as
necessary; and issue a new decision. 9 Accordingly, it is ORDERED: 10 1. Pursuant to sentence
four of 42 U.S.C. § 405(g), the Court grants the joint motion to 11 remand (Doc.

No. 12) and REVERSES the Commissioner's decision. This case is 12 REMANDED to the
Commissioner of Social Security for further proceedings 13 consistent with this Order. 14 2. A
motion for attorney fees may be filed within thirty (30) days. 15 3.

The Clerk shall enter judgment in favor of Plaintiff, terminate any deadlines, and close 16 this
case. 17 | Dated: __July 7, 2025 Wh fareh Zaskth 19 HELENA M. BARCH-KUCHTA UNITED
STATES MAGISTRATE JUDGE 21 22 23 24 25 26 27 28