

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PRECEDENTIAL VALUE	Unpublished district court order; precedential status is unknown.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)