

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF  
ILLINOIS, URBANA DIVISION

Jennifer Bourne v. Commissioner of Social Security

Bourne · No. 25-3158 · Decided January 12, 2026

SUMMARY

The United States District Court for the Central District of Illinois recommends dismissing Jennifer Bourne’s Social Security case without prejudice for failure to prosecute and failure to maintain a current address. The recommendation relies on Federal Rule of Civil Procedure 41(b) and advises the parties of the fourteen-day period for filing objections.

CASE DETAILS

|                       |                                                                                                                                      |
|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Central District of Illinois, Urbana Division                                                   |
| WRITING FOR THE COURT | Eric I. Long                                                                                                                         |
| JURISDICTION          | United States District Court for the Central District of Illinois, Urbana Division                                                   |
| DECIDED               | January 12, 2026                                                                                                                     |
| DOCKET                | 25-3158                                                                                                                              |
| DISPOSITION           | other                                                                                                                                |
| PROCEDURAL POSTURE    | Report and recommendation recommending dismissal without prejudice for failure to prosecute and failure to comply with court orders. |
| PRECEDENTIAL VALUE    | nonprecedential                                                                                                                      |
| PARTIES               | Jennifer Bourne v. Commissioner of Social Security                                                                                   |

TOPICS

- civil procedure
- sanctions

PRACTICE AREAS

- civil procedure
- administrative law

QUESTIONS PRESENTED

1. Whether the action should be dismissed without prejudice for failure to prosecute and failure to comply with court orders when the plaintiff failed to maintain a current address and did not respond to an order to show cause.

## HOLDINGS

1. The magistrate judge recommended that the action be dismissed without prejudice under Federal Rule of Civil Procedure 41(b) because Plaintiff failed to maintain a current address, failed to respond to the order to show cause, and thereby failed to prosecute and comply with court orders.

## KEY QUOTATIONS

*“Without a current address for Plaintiff, the Court and parties are unable to communicate by mail with Plaintiff, so the case is essentially at a standstill.”*

*“The Court recommends that Plaintiff’s case be DISMISSED for failure to prosecute pursuant to Fed. R. Civ. P. 41(b).”*

## FACTUAL BACKGROUND

The court had previously warned Plaintiff that she was required to maintain a current address on the docket. After the December 22, 2025, order to show cause, Plaintiff failed to respond and still had no current address on file. The lack of a current address prevented the court and the parties from communicating with Plaintiff, leaving the case at a standstill.

## PROCEDURAL HISTORY

The court ordered Plaintiff on December 22, 2025, to show cause within fourteen days why the action should not be dismissed for failure to maintain a current address. Plaintiff did not respond and had no current address on file. The magistrate judge recommended dismissal without prejudice under Federal Rule of Civil Procedure 41(b), subject to objections under 28 U.S.C. § 636(b)(1).

## DISPOSITION

other

## CASES CITED

- Harris v. Emanuele, 826 F. Appx. 567, 569 (7th Cir. 2020)
- Video Views, Inc. v. Studio 21, Ltd., 797 F.2d 538, 539 (7th Cir. 1986)

## OPINION

UNITED STATES DISTRICT COURT CENTRAL DISTRICT OF ILLINOIS Urbana Division  
JENNIFER BOURNE, Plaintiff, v. Case No. 25-3158 COMMISSIONER OF SOCIAL  
SECURITY, Defendant. REPORT AND RECOMMENDATION On December 22, 2025, the Court

entered an Order directing Plaintiff to show cause within 14 days why this cause of action should not be dismissed for failure to maintain a current address on the docket.

Plaintiff did not respond to the Order to Show Cause and does not have a current address on file. Without a current address for Plaintiff, the Court and parties are unable to communicate by mail with Plaintiff, so the case is essentially at a standstill. Plaintiff has a duty to maintain a current address and has failed to do so despite multiple warnings.

The Court recommends that this case be dismissed without prejudice for failure to prosecute and for failure to follow Court orders, pursuant to Federal Rule of Civil Procedure 41(b). See also *Harris v. Emanuele*, 826 F. Appx. 567, 569 (7th Cir. 2020) (affirming district court's ruling declining to reopen case after dismissal without prejudice).

Accordingly, the Court recommends that Plaintiff's case be DISMISSED for failure to prosecute pursuant to Fed. R. Civ. P. 41(b). The parties are advised that any objection to this recommendation must be filed in writing with the clerk within fourteen (14) days after being served with a copy of this Report and Recommendation. See 28 U.S.C. § 636(b)(1). Failure to object will constitute a waiver of objections on appeal.

*Video Views, Inc. v. Studio 21, Ltd.*, 797 F.2d 538, 539 (7th Cir. 1986). ENTERED this 12th day of January, 2026. s/ ERIC I. LONG UNITED STATES MAGISTRATE JUDGE