

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PRECEDENTIAL VALUE	nonprecedential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)