

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
OHIO, WESTERN DIVISION

Michael James Church v. Commissioner of Social Security

Church · No. 3:25-cv-390 · Decided March 31, 2026

SUMMARY

The United States District Court for the Northern District of Ohio adopted a magistrate judge’s Report and Recommendation after no party filed timely objections. The court reversed the Commissioner of Social Security’s decision denying disability insurance benefits and supplemental security income and remanded the case to the Commissioner and the ALJ for further proceedings.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio, Western Division
WRITING FOR THE COURT	Jeffrey J. Helmick
JURISDICTION	United States District Court for the Northern District of Ohio, Western Division
DECIDED	March 31, 2026
DOCKET	3:25-cv-390
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	The district court reviewed a magistrate judge's Report and Recommendation recommending that the Commissioner's decision denying disability insurance benefits and supplemental security income be vacated. No party filed objections within the prescribed period.
STANDARD OF REVIEW	The district court adopted the magistrate judge's Report and Recommendation after the parties waived further review by failing to file timely objections.
PRECEDENTIAL VALUE	Unknown
PARTIES	Michael James Church v. Commissioner of Social Security

TOPICS

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

PRACTICE AREAS

Social Security

administrative law

civil procedure

QUESTIONS PRESENTED

1. Whether the parties' failure to file timely objections to the magistrate judge's Report and Recommendation constituted a waiver of subsequent review.
2. Whether the district court should adopt the magistrate judge's Report and Recommendation and reverse and remand the Commissioner's decision.

HOLDINGS

1. A party's failure to file objections within the specified fourteen-day period constitutes a waiver of subsequent review under Local Rule 72.3(b).
2. The district court adopted the magistrate judge's Report and Recommendation in its entirety, reversed the Commissioner's decision, and remanded the case to the Commissioner and the administrative law judge for proceedings consistent with the Report and Recommendation.

KEY QUOTATIONS

“Failure to file objections within the specified time may forfeit the right to appeal the District Court’s order.”
(Doc. No. 12 at 23)

FACTUAL BACKGROUND

Michael James Church applied for disability insurance benefits and supplemental security income. The Commissioner of Social Security denied his applications. The district court's order does not independently recite the underlying medical or vocational facts and instead adopts the magistrate judge's Report and Recommendation.

PROCEDURAL HISTORY

On August 20, 2025, Magistrate Judge James E. Grimes, Jr. issued a Report and Recommendation recommending that the Commissioner's decision be vacated. After more than fourteen days passed without objections, the district court deemed the parties' failure to object a waiver of subsequent review, adopted the Report and Recommendation in its entirety, reversed the Commissioner's decision, and remanded the case to the Commissioner and the administrative law judge.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The case is remanded to the Commissioner of Social Security and the administrative law judge for proceedings consistent with the magistrate judge's Report and Recommendation.

CASES CITED

- *Berkshire v. Beauvais*, 928 F.3d 520, 530–31 (6th Cir. 2019)

OPINION

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO
WESTERN DIVISION Michael James Church, Case No. 3:25-cv-390 Plaintiff, v. ORDER AND
JUDGEMENT ENTRY Commissioner of Social Security, Defendant. On August 20, 2025, United
States Magistrate Judge James E. Grimes, Jr. issued a Report and Recommendation (“R & R”) recommending I vacate the Commissioner of Social Security’s decision denying Plaintiff’s applications for disability insurance benefits and supplemental security income.

(Doc. No. 12). In the R & R, he notified the parties: Any objections to this Report and Recommendation must be filed with the Clerk of Court within 14 days after the party objecting has been served with a copy of this Report and Recommendation. 28 U.S.C. § 636(b)(1). Failure to file objections within the specified time may forfeit the right to appeal the District Court’s order.

See *Berkshire v. Beauvais*, 928 F.3d 520, 530–31 (6th Cir. 2019). (Id. at 23). More than fourteen days passed, and no party filed any objection to the R & R. I consider their failure to file objections to “constitute a waiver of subsequent review,” Local R. 72.3(b), and adopt Judge Grimes’s R & R in its entirety as the final Order of this Court.

The Commissioner’s decision is reversed, and this case is remanded to the Commissioner and the ALJ for proceedings consistent with the R & R. So Ordered. s/ Jeffrey J. Helmick United States District Judge