

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
ARKANSAS, CENTRAL DIVISION

Jason Simpson v. Commissioner, Social Security Administration

Simpson · No. 4:25-cv-00420 JM/PSH · Decided December 15, 2025

SUMMARY

The document recommends granting the Commissioner of Social Security’s unopposed motion for voluntary remand. It characterizes the remand as a sentence four remand under 42 U.S.C. § 405(g) and *Melkonyan v. Sullivan*.

CASE DETAILS

COURT	United States District Court for the Eastern District of Arkansas, Central Division
JURISDICTION	United States District Court for the Eastern District of Arkansas, Central Division
DECIDED	December 15, 2025
DOCKET	4:25-cv-00420 JM/PSH
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	The Commissioner moved, without opposition, for voluntary remand of the Social Security action for further administrative proceedings. The magistrate judge issued proposed findings and recommendations recommending that the motion be granted.
PRECEDENTIAL VALUE	Unknown; proposed findings and recommendations

TOPICS

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

PRACTICE AREAS

- Social Security
- administrative law
- federal civil procedure

QUESTIONS PRESENTED

- Whether the Commissioner's unopposed motion for voluntary remand should be granted.
- Whether the requested remand constitutes a sentence-four remand under 42 U.S.C. § 405(g).

HOLDINGS

1. For good cause, the court recommended granting the Commissioner's unopposed motion to reverse and remand the case for further administrative proceedings.

KEY QUOTATIONS

"This is a "sentence four" remand within the meaning of 42 U.S.C. § 405(g) and Melkonyan v. Sullivan, 501 U.S. 89 (1991)."

FACTUAL BACKGROUND

The opinion contains no substantive factual discussion concerning Simpson's underlying Social Security claim. It states only that the Commissioner requested voluntary remand for further administrative proceedings and that the motion was unopposed.

PROCEDURAL HISTORY

Jason Simpson brought an action seeking judicial review of a Social Security Administration decision. The Commissioner filed an unopposed motion for voluntary remand, and the court recommended reversal and remand for further administrative proceedings under sentence four of 42 U.S.C. § 405(g). The recommendation was transmitted to District Judge James M. Moody, Jr., subject to fourteen-day objections.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The case is to be reversed and remanded to the Commissioner for further administrative proceedings. The remand is identified as a sentence-four remand under 42 U.S.C. § 405(g), subject to adoption of the recommendation by the district judge.

CASES CITED

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