

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
LOUISIANA

Craig Brodie v. Commissioner of Social Security

Brodie · No. 25-365-EWD · Decided March 17, 2026

SUMMARY

The United States District Court for the Middle District of Louisiana grants Craig Brodie’s unopposed motion for attorney fees under the Equal Access to Justice Act after remanding his Social Security disability-benefits claim for further proceedings. The court awards \$1,750 for 10 hours of work at \$175 per hour, subject to offset for qualifying debts under the Treasury Offset Program, and directs that payment be made to Brodie.

CASE DETAILS

COURT	United States District Court for the Middle District of Louisiana
WRITING FOR THE COURT	Erin Wilder-Doomes
JURISDICTION	United States District Court for the Middle District of Louisiana
DECIDED	March 17, 2026
DOCKET	25-365-EWD
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff sought attorney fees under the Equal Access to Justice Act after the Commissioner moved to reverse and remand the denial of Plaintiff's application for disability benefits under sentence four of 42 U.S.C. § 405(g).
STANDARD OF REVIEW	Under the EAJA, attorney fees are awarded to a prevailing party unless the government's position was substantially justified or special circumstances make an award unjust; the requested time and hourly rate must be reasonable.
PRECEDENTIAL VALUE	Unknown
PARTIES	Craig Brodie v. Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

remedies

PRACTICE AREAS

administrative law

social security

attorney fees

QUESTIONS PRESENTED

1. Whether Plaintiff was entitled to attorney fees under the Equal Access to Justice Act after obtaining a sentence-four remand.
2. Whether 10 hours of attorney time and an hourly rate of \$175 were reasonable under the EAJA.
3. Whether the EAJA fee award should be payable directly to Plaintiff and subject to offset for qualifying debts owed to the government.

HOLDINGS

1. Plaintiff was entitled to an EAJA award because he was the prevailing party following the sentence-four reversal and remand, the Commissioner did not oppose the motion, and no circumstance identified in the opinion barred an award.
2. The requested 10 hours of work at an hourly rate of \$175 were reasonable and compensable under the EAJA.
3. The EAJA award must be made payable directly to Plaintiff, with payment subject to reduction to satisfy qualifying pre-existing debts owed by Plaintiff to the government.

KEY QUOTATIONS

“The United States Supreme Court has held that an EAJA fee award is payable to the prevailing litigant, rather than the litigant’s attorney.” (II.B)

“IT IS ORDERED that the Unopposed Motion for Attorney Fees, filed by Plaintiff Craig Brodie, is GRANTED, and that Frank Bisignano, Commissioner of Social Security Administration, shall remit a check made payable to “Craig Brodie” for attorney fees in the amount of \$1,750.00 (10 attorney hours at the hourly rate of \$175.00), pursuant to the Equal Access to Justice Act, 28 U.S.C. § 2412(d)(1)(A).” (disposition)

FACTUAL BACKGROUND

Plaintiff appealed the denial of his application for disability benefits. The Commissioner sought a sentence-four remand to further develop the record, conduct additional administrative proceedings, and issue a new decision. After the court remanded the case, Plaintiff sought EAJA compensation for 10 hours of work at an hourly rate of \$175, and the Commissioner did not dispute the reasonableness of the hours or rate.

PROCEDURAL HISTORY

Plaintiff appealed the Commissioner's denial of disability benefits. The Commissioner moved to reverse and remand so the administrative record could be further developed and additional proceedings conducted; the court granted that motion and entered judgment reversing and remanding the case. Plaintiff then moved for \$1,750 in EAJA fees for 10 hours of work at \$175 per hour, and the court granted the unopposed motion.

DISPOSITION

other

REMAND INSTRUCTIONS

No new remand was ordered in this fee order. The prior sentence-four remand remains in effect for further administrative proceedings, and the Commissioner must issue payment of the fee award directly to Plaintiff after any required Treasury Offset Program reduction.

CASES CITED

- Baker v. Bowen, 839 F.2d 1075, 1084 (5th Cir. 1988)
- Gann v. Colvin, No. 14-189, 2017 WL 385038, at **2-3 (M.D. La. Jan. 1, 2017)
- Frank v. O'Malley, No. 24-376, 2025 WL 1202542, at *3 (M.D. La. Apr. 25, 2025)
- Astrue v. Ratliff, 560 U.S. 586, 598 (2010)

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