

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Powers v. Commissioner of Social Security

Powers · No. 1:25-cv-00498-HBK · Decided July 31, 2025

SUMMARY

The United States District Court for the Eastern District of California granted the parties’ stipulated motion to remand under sentence four of 42 U.S.C. § 405(g). The court reversed the Commissioner of Social Security’s final decision and remanded the case for further administrative proceedings, including possible further record development, a new hearing, and a new decision.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Helena M. Barch-Kuchta
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	July 31, 2025
DOCKET	1:25-cv-00498-HBK
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review of the Commissioner's final Social Security decision. The parties jointly stipulated to remand under sentence four of 42 U.S.C. § 405(g).
PRECEDENTIAL VALUE	unpublished
PARTIES	Katrina Rebecca Powers v. Commissioner of Social Security

TOPICS

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

PRACTICE AREAS

Social Security law administrative law judicial review of agency action remedies

QUESTIONS PRESENTED

- Whether the court should grant the parties' stipulated request for a sentence-four remand under 42 U.S.C. § 405(g).

2. Whether the Commissioner's final decision should be reversed in conjunction with the sentence-four remand.

HOLDINGS

1. The court may remand a Social Security case under sentence four of 42 U.S.C. § 405(g) by entering a judgment reversing the Commissioner's decision and remanding for further proceedings.

KEY QUOTATIONS

“A sentence four remand authorizes a court to enter “a judgment affirming, modifying, or reversing the decision of the Secretary, with or without resetting the cause for a rehearing.”” (1-2)

FACTUAL BACKGROUND

Katrina Rebecca Powers brought an action seeking review of a final decision by the Commissioner of Social Security. Both parties agreed that the matter should be remanded to the Commissioner for further administrative proceedings, including further development of the record, a new hearing opportunity, and a new decision.

PROCEDURAL HISTORY

The parties filed a joint motion to remand on July 30, 2025. The court granted the motion, reversed the Commissioner's final decision, remanded for further administrative proceedings, directed entry of judgment for plaintiff, and closed the case.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Commissioner must further develop the record as necessary, offer the claimant an opportunity for a new hearing, and issue a new decision. The case was remanded for further proceedings consistent with the order.

CASES CITED

- Melkonyan v. Sullivan, 501 U.S. 89, 97-98 (1991)

OPINION

1 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT 9 FOR THE EASTERN DISTRICT OF
CALIFORNIA 10 11 KATRINA REBECCA POWERS, Case No. 1:25-cv-00498-HBK 12
Plaintiff, ORDER GRANTING PARTIES’ STIPULATED MOTION TO REMAND 13 v. UNDER
SENTENCE FOUR OF 42 U.S.C. § 405(g), REVERSING FINAL DECISION AND 14
COMMISSIONER OF SOCIAL REMANDING CASE1 SECURITY, 15 (Doc. No. 14)
Defendant.

16 17 18 Pending before the Court is the parties' joint motion to remand filed July 30, 2025. (Doc.
19 No. 14). Plaintiff Katrina Rebecca Powers and the Commissioner of Social Security agree that
20 this case should be remanded for further administrative proceedings under sentence four of 42
21 U.S.C. § 405(g). (Id.). 22 The United States Supreme Court held that the Social Security Act
permits remand in 23 conjunction with a judgment either affirming, reversing, or modifying the
Secretary's decision.

24 See *Melkonyan v. Sullivan*, 501 U.S. 89, 97-98 (1991) (addressing issue of attorney's fees
under 25 the Equal Access to Justice Act and calculating deadline using date of final judgment).
The 26 1 Both parties have consented to the jurisdiction of a magistrate judge in accordance with
28 U.S.C. 27 §636(c)(1). (Doc. No. 9). 28 1 | *Melkonyan* court recognized 42 U.S.C. § 405(g)
contemplates only two types of remand — 2 || sentence four or sentence six.

Jd. at 98. A sentence four remand authorizes a court to enter “a 3 | judgment affirming, modifying,
or reversing the decision of the Secretary, with or without 4 || resetting the cause for a rehearing.”
Jd. (other citations omitted). 5 The Court grants the parties' motion to remand under sentence four
and reverses the 6 | Commissioner's final decision.

As agreed upon by the parties, upon remand, the Commissioner 7 | will further develop the record
as necessary, offer the claimant an opportunity for a new hearing, 8 || and issue a new decision. 9
Accordingly, it is ORDERED: 10 1. Pursuant to sentence four of 42 U.S.C. § 405(g), the Court
grants the joint motion to 11 remand (Doc. No. 14) and REVERSES the Commissioner's decision.

This case is 12 REMANDED to the Commissioner of Social Security for further proceedings 13
consistent with this Order. 14 2. A motion for attorney fees may be filed within thirty (30) days. 15
3. The Clerk shall enter judgment in favor of Plaintiff, terminate any deadlines, and close 16 this
case. 17 Dated: _ July 31, 2025 Mile. Wh. foareh Zaskth 19 HELENA M. BARCH-KUCHTA
UNITED STATES MAGISTRATE JUDGE 21 22 23 24 25 26 27 28