

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

Enrico Renaldo Taffi v. Commissioner of Social Security

Taffi · No. 5:25-cv-00040 · Decided March 12, 2026

SUMMARY

The United States District Court for the Northern District of Ohio adopted a magistrate judge’s Report and Recommendation concerning Enrico Renaldo Taffi’s challenge to the denial of Period of Disability and Disability Insurance Benefits. Because no timely objections were filed and the court found no clear error, it affirmed the Commissioner of Social Security’s decision.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio, Eastern Division
WRITING FOR THE COURT	David A. Ruiz
JURISDICTION	United States District Court for the Northern District of Ohio, Eastern Division
DECIDED	March 12, 2026
DOCKET	5:25-cv-00040
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought district-court review of the Commissioner of Social Security's final decision denying his application for a Period of Disability and Disability Insurance Benefits. The magistrate judge recommended affirmance, and the district court reviewed and adopted the Report and Recommendation after Plaintiff filed no objections.
STANDARD OF REVIEW	When a party properly objects to a magistrate judge's Report and Recommendation, the district court reviews the challenged portions de novo. When no timely objections are filed, the district court need only determine whether there is clear error on the face of the record before accepting the recommendation. In the Sixth Circuit, failure to object constitutes forfeiture.
PRECEDENTIAL VALUE	Unknown
PARTIES	Enrico Renaldo Taffi v. Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

civil procedure

PRACTICE AREAS

administrative law

social security benefits

civil procedure

QUESTIONS PRESENTED

1. What standard of review applies to a magistrate judge's Report and Recommendation when no timely objections are filed?
2. Whether the Report and Recommendation recommending affirmance of the Commissioner's denial of benefits should be adopted after review for clear error.

HOLDINGS

1. When no timely objections are filed to a magistrate judge's Report and Recommendation, the district court need only satisfy itself that there is no clear error on the face of the record before accepting the recommendation.
2. The court found no clear error in the Report and Recommendation, adopted it, and affirmed the Commissioner's decision denying Plaintiff's application for benefits.

KEY QUOTATIONS

"When no timely objection is filed, the court need only satisfy itself that there is no clear error on the face of the record in order to accept the recommendation."

"In the Sixth Circuit, failure to object constitutes a forfeiture."

FACTUAL BACKGROUND

Plaintiff applied for a Period of Disability and Disability Insurance Benefits. The Commissioner issued a final decision denying the application, which Plaintiff challenged in the district court.

PROCEDURAL HISTORY

Plaintiff filed his Complaint on January 1, 2025, challenging the Commissioner's denial of benefits. Magistrate Judge Amanda M. Knapp issued a Report and Recommendation on December 19, 2025, recommending that the Commissioner's decision be affirmed. Plaintiff filed no timely objections, so the district court reviewed the record for clear error, adopted the Report and Recommendation, and affirmed the Commissioner's decision.

DISPOSITION

affirmed

CASES CITED

- Campbell v. United States Dist. Court, 501 F.2d 196, 206 (9th Cir. 1974), cert. denied, 419 U.S. 879
- Schuster v. Comm'r of Soc. Sec., 2022 WL 219327, at *1 (N.D. Ohio Jan. 25, 2022)
- Berkshire v. Beauvais, 928 F.3d 520, 530 (6th Cir. 2019)
- Thomas v. Arn, 474 U.S. 140, 152 (1985)

OPINION

Taffi

PER CURIAM.

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF OHIO

EASTERN DIVISION

) CASE NO. 5:25-cv-00040

ENRICO RENALDO TAFFI,)

) JUDGE DAVID A. RUIZ

Plaintiff,)) v.))

COMMISSIONER OF SOCIAL SECURITY,)
MEMORANDUM OPINION AND ORDER

) Defendant. This matter is before the Court on the Report and Recommendation of Magistrate Judge Amanda M. Knapp. (R. 9).1 Plaintiff Enrico Renaldo Taffi filed a Complaint (R. 1) on January 1, 2025, challenging the final decision of the Commissioner of Social Security denying his application for a Period of Disability (POD) and Disability Insurance Benefits (DIB). Magistrate Judge Knapp's Report and Recommendation, issued on December 19, 2025, recommends the Court affirm the Commissioner's decision. (R. 9). "Within 14 days of being served with a copy of the recommended disposition, a party may serve and file specific written objections to the proposed findings and recommendations." Fed. R. Civ. P. 72(b)(2); see also 28 U.S.C. § 636(b)(1); Local Rule 72.3(b). To date, Plaintiff has not filed any objections. I. Standard of Review for a Magistrate Judge's Report and Recommendation The applicable standard of review of a magistrate judge's report and recommendation 1 This case was referred to the magistrate judge pursuant to Local Rule 72.2. depends upon whether objections were made to that report. When objections are made to a report and recommendation of a magistrate judge, the district court conducts a de novo review. Federal Rule of Civil Procedure 72(b)(3) states: Resolving Objections. The district judge must determine de novo any part of the magistrate judge's disposition that has been properly objected to. The district judge may accept, reject, or modify the recommended disposition; receive further evidence; or return the matter to the magistrate judge with instructions. The text of Rule 72(b)(3) addresses only the review of reports to which objections have been made but does not specify any standard of review for those reports to which no objections have lodged. The Advisory Committee on Civil Rules commented on a district court's review of unopposed reports by magistrate judges. In regard to subsection (b) of Rule 72, the Advisory Committee stated: "When

no timely objection is filed, the court need only satisfy itself that there is no clear error on the face of the record in order to accept the recommendation.” Fed. R. Civ. P. 72 Advisory Committee’s notes (citing *Campbell v. United States Dist. Court*, 501 F.2d 196, 206 (9th Cir. 1974), cert. denied, 419 U.S. 879)). “In the Sixth Circuit, failure to object constitutes a forfeiture.” *Schuster v. Comm’r of Soc. Sec.*, 2022 WL 219327, at *1 (N.D. Ohio, Jan. 25, 2022) (Lioi, J.) (citing *Berkshire v. Beauvais*, 928 F.3d 520, 530 (6th Cir. 2019) (“We clarify that forfeiture, rather than waiver, is the relevant term here.”)); see also *Thomas v. Arn*, 474 U.S. 140, 152 (1985) (holding that the Sixth Circuit’s waiver/forfeiture rule is within its supervisory powers and “[t]here is no indication that Congress, in enacting § 636(b)(1)(C), intended to require a district judge to review a magistrate’s report to which no objections are filed”). Here, the Report and Recommendation placed the parties on notice as to the potential for forfeiture in the event of failure to object. (R. 9, Page ID#: 1291). II. Conclusion The Court having received no timely objections, has carefully reviewed the Report and Recommendation and finding no clear error, agrees with the findings set forth therein. The Magistrate Judge’s Report and Recommendation (R. 9) is hereby ADOPTED. The Commissioner’s decision is hereby AFFIRMED. IT IS SO ORDERED. David A. Ruiz David A. Ruiz United States District Judge Date: March 12, 2026