

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Alberto Jose Corpus v. Commissioner of Social Security

Corpus · No. 1:25-cv-00067-CDB · Decided July 22, 2025

SUMMARY

The court granted the parties’ stipulated request for \$8,000 in attorney’s fees under the Equal Access to Justice Act after remanding the Social Security case for further proceedings under sentence four of 42 U.S.C. § 405(g). The fees are payable to the plaintiff, subject to Treasury Offset Program requirements, with direct payment to plaintiff’s counsel if no federal debt prevents it.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	July 22, 2025
DOCKET	1:25-cv-00067-CDB
DISPOSITION	approved
PROCEDURAL POSTURE	After the court granted the parties' stipulated request for voluntary sentence-four remand in a Social Security action, entered judgment, and remanded the case to the Commissioner for further proceedings, the plaintiff filed a stipulated request for attorney fees under the Equal Access to Justice Act.
STANDARD OF REVIEW	The court applied the Equal Access to Justice Act standard requiring an award to a prevailing party unless the government's position was substantially justified or special circumstances would make an award unjust; it also reviewed the requested hours and rate for reasonableness.
PRECEDENTIAL VALUE	unknown

TOPICS

- attorney fees
- judicial review of agency action
- remedies
- civil procedure

PRACTICE AREAS

- administrative law
- social security
- civil procedure
- attorney fees

QUESTIONS PRESENTED

1. Whether plaintiff qualified as a prevailing party after obtaining a sentence-four remand under 42 U.S.C. § 405(g).
2. Whether plaintiff was entitled to attorney fees under the EAJA because the government's position was not substantially justified and no special circumstances made an award unjust.
3. Whether the stipulated \$8,000 fee request was reasonable and should be paid to plaintiff subject to Treasury Offset Program provisions, with direct payment to counsel if no federal debt offset applied.

HOLDINGS

1. A party who prevails through a sentence-four remand order under 42 U.S.C. § 405(g) qualifies as a prevailing party for purposes of an EAJA fee award.
2. The court shall award EAJA attorney fees to a prevailing party where the government has not shown that its position was substantially justified and no special circumstances make the award unjust.
3. The stipulated request for \$8,000 in EAJA fees was reasonable and commensurate with the work required to review the administrative record and prepare the summary-judgment motion.
4. The fees are payable to plaintiff, but if the Department of the Treasury determines that plaintiff owes no federal debt, the government must cause payment of the fees, expenses, and costs to be made directly to plaintiff's counsel under the stipulation.

KEY QUOTATIONS

“Under the EAJA, a court shall award attorney fees to the prevailing party unless it finds the government’s position was “substantially justified or that special circumstances make such an award unjust.”” (at 1)

“The parties’ stipulated request for attorney’s fees pursuant to the EAJA (Doc. 20) is GRANTED” (at 3)

FACTUAL BACKGROUND

Plaintiff prevailed when the court remanded his Social Security case for further proceedings under sentence four of 42 U.S.C. § 405(g). He sought \$8,000 in EAJA attorney fees, calculated using an applicable hourly rate of \$251.84. The record contained an approximately 1,079-page certified administrative record, and plaintiff's summary-judgment motion presented three legal issues over approximately 17 pages of argument.

PROCEDURAL HISTORY

The court granted a stipulated request for voluntary remand under sentence four of 42 U.S.C. § 405(g) on July 8, 2025, and entered judgment the same day. Plaintiff then timely filed a stipulated EAJA fee request seeking \$8,000, which the Commissioner did not oppose. The court granted the request and ordered payment under the parties' stipulated terms.

DISPOSITION

approved

CASES CITED

- *Shalala v. Schaefer*, 509 U.S. 292, 300-02 (1993)
- *Van v. Barnhart*, 483 F.3d 600, 607 (9th Cir. 2007)
- *Sanchez v. Berryhill*, No. 1:16-cv-01081-SKO, 2018 WL 509817, at *2 (E.D. Cal. Jan. 23, 2018)
- *Knyazhina v. Colvin*, No. 2:12-cv-2726 DAD, 2014 WL 5324302, at 1 (E.D. Cal. Oct. 17, 2014)
- *Astrue v. Ratliff*, 560 U.S. 586 (2010)

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