

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
NORTH CAROLINA

April Springston v. Frank Bisignano, Acting Commissioner of Social
Security

Springston · No. 1:24-cv-276-MOC-WCM · Decided June 1, 2026

SUMMARY

The United States District Court for the Western District of North Carolina reviewed a magistrate judge’s Memorandum and Recommendation in a Social Security case where no objections were filed. The court affirmed the recommendation, vacated the Commissioner’s decision, and remanded the matter for further administrative proceedings.

CASE DETAILS

COURT	United States District Court for the Western District of North Carolina
WRITING FOR THE COURT	Max O. Cogburn, Jr.
JURISDICTION	United States District Court for the Western District of North Carolina
DECIDED	June 1, 2026
DOCKET	1:24-cv-276-MOC-WCM
DISPOSITION	remanded
PROCEDURAL POSTURE	The district court reviewed a magistrate judge's Memorandum and Recommendation in a Social Security appeal. No party filed objections within the permitted period.
STANDARD OF REVIEW	Under 28 U.S.C. § 636(b)(1), a district court reviews de novo those portions of a magistrate judge's report or recommendation to which a specific objection is made. De novo review may be dispensed with for strictly legal issues where no factual issues are challenged and is not required for general or conclusory objections that fail to identify a specific error. The statute does not facially require review of issues to which no objection is made, although the district judge remains responsible for the final determination and outcome.
PRECEDENTIAL VALUE	Unpublished district court order; persuasive value only.
PARTIES	April Springston v. Frank Bisignano, Acting Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

civil procedure

PRACTICE AREAS

Social Security

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. What standard of review applies when no party objects to a magistrate judge's Memorandum and Recommendation?
2. Whether the magistrate judge's Memorandum and Recommendation should be affirmed and the Commissioner's decision vacated and remanded for further administrative proceedings.

HOLDINGS

1. Although 28 U.S.C. § 636(b)(1) does not require de novo review of issues that are not the subject of an objection, the district judge remains responsible for the final determination and may conduct a careful review of the recommendation.
2. The magistrate judge's Memorandum and Recommendation was affirmed, the Commissioner's decision was vacated, and the matter was remanded for further administrative proceedings.

KEY QUOTATIONS

“Nonetheless, a district judge is responsible for the final determination and outcome of the case, and accordingly the Court has conducted a careful review of the magistrate judge’s recommendation.” (Section I)

“the Memorandum and Recommendation (Doc. No. 8) is AFFIRMED, the Commissioner’s decision is vacated, and the matter is remanded for further administrative proceedings.” (Order)

FACTUAL BACKGROUND

The Commissioner of Social Security issued a decision adverse to April Springston. A magistrate judge reviewed the matter and issued a Memorandum and Recommendation recommending that the claimant receive relief. The district court found the recommendation consistent with current law and supported by the pleadings, vacated the Commissioner's decision, and remanded for further administrative proceedings.

PROCEDURAL HISTORY

The magistrate judge issued a Memorandum and Recommendation recommending relief to the claimant. After the objection period expired without objections, the district court conducted a careful review, affirmed the recommendation, vacated the Commissioner's decision, and remanded for further administrative proceedings.

DISPOSITION

remanded

REMAND INSTRUCTIONS

The matter is remanded for further administrative proceedings in accordance with the affirmed Memorandum and Recommendation.

CASES CITED

- Camby v. Davis, 718 F.2d 198, 200 (4th Cir. 1983)
- Orpiano v. Johnson, 687 F.2d 44, 47 (4th Cir. 1982)
- Thomas v. Arn, 474 U.S. 140, 149 (1985)

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