

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Sanders v. Commissioner of Social Security

Case No. 1:18-cv-01388-CDB (SS) (E.D. Cal. Mar. 3, 2025) · No. 1:18-cv-01388-CDB (SS) · Decided March 3, 2025

SUMMARY

The United States District Court for the Eastern District of California granted the parties’ stipulated request for attorney’s fees and costs under the Equal Access to Justice Act. The court awarded \$11,000 in fees and \$400 in costs following a sentence-four remand in the Social Security case. Payment is to be made to the plaintiff, subject to any federal debt offset, with direct payment to plaintiff’s counsel if no offset applies.

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	March 3, 2025
DOCKET	1:18-cv-01388-CDB (SS)
DISPOSITION	other
PROCEDURAL POSTURE	After granting in part Plaintiff's motion for summary judgment and granting the Commissioner's motion for voluntary remand under sentence four of 42 U.S.C. § 405(g), the court considered Plaintiff's stipulated application for attorney fees and costs 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. The court also assessed the reasonableness of the requested hours and fees.
PRECEDENTIAL VALUE	unpublished, nonprecedential district court order
PARTIES	Ronnie Sanders v. Commissioner of Social Security

TOPICS

- attorney fees
- costs
- judicial review of agency action
- summary judgment
- remedies

PRACTICE AREAS

administrative law

social security

attorney fees

costs

QUESTIONS PRESENTED

1. Whether Plaintiff was entitled to attorney fees under the Equal Access to Justice Act after obtaining a sentence-four remand and judgment.
2. Whether the requested \$11,000 in attorney fees was reasonable.
3. Whether Plaintiff was entitled to recover \$400 in litigation costs under the EAJA and 28 U.S.C. § 1920.
4. Whether payment of the award was subject to Treasury Offset Program deductions and, if not, could be made directly to Plaintiff's counsel.

HOLDINGS

1. Plaintiff was entitled to an EAJA award because he was the prevailing party following a sentence-four remand, timely filed his fee application, the government did not establish that its position was substantially justified, and no special circumstances made an award unjust.
2. The requested \$11,000 EAJA fee award was reasonable and commensurate with the work required in the case.
3. Plaintiff was entitled to recover \$400 in costs under the EAJA and 28 U.S.C. § 1920.
4. The fee award was payable to Plaintiff, but if the Department of the Treasury determined that Plaintiff owed no federal debt, the government was required to pay the fees, expenses, and costs directly to Plaintiff's counsel pursuant to 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 Court finds this reasonable and commensurate with the number of hours an attorney would need to have spent reviewing the certified administrative record in this case” (at 2)

FACTUAL BACKGROUND

Plaintiff obtained a favorable sentence-four remand of his Social Security case after the court granted in part his motion for summary judgment and granted the Commissioner's motion for voluntary remand. Plaintiff's counsel reviewed an approximately 3,022-page certified administrative record, prepared a summary-judgment motion containing ten pages of argument, and prepared a reply brief containing five pages of argument. Plaintiff then sought \$11,000 in EAJA fees and \$400 in costs pursuant to the parties' stipulation.

PROCEDURAL HISTORY

On January 21, 2025, the court granted in part Plaintiff's motion for summary judgment, granted the Commissioner's motion for voluntary remand, and remanded the Social Security case to the Commissioner for

further proceedings. Judgment was entered the same day. Plaintiff filed a stipulated request for EAJA attorney fees and costs on February 28, 2025, and the court granted the request.

DISPOSITION

other

REMAND INSTRUCTIONS

The Commissioner was directed to pay Plaintiff \$11,000 in attorney fees and \$400 in costs under the terms of the parties' stipulation. The underlying Social Security case had previously been remanded to the Commissioner for further proceedings consistent with the court's January 21, 2025 order.

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)
- Thangaraja v. Gonzales, 428 F.3d 870, 876-77 (9th Cir. 2005)
- Armstrong v. Astrue, No. CIV-S-07-1456-DAD, 2008 WL 2705023, at *2 (E.D. Cal. July 9, 2008)
- Astrue v. Ratliff, 560 U.S. 586 (2010)

INSTRUCTIONS FOR AN AI ASSISTANT

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