

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
VIRGINIA, ALEXANDRIA DIVISION

Anthony W. v. Frank J. Bisignano

Civil Action No. 1:25-cv-400 (RDA/LRV) · No. 1:25-cv-400 (RDA/LRV) · Decided March 18, 2026

SUMMARY

The United States District Court for the Eastern District of Virginia adopts a magistrate judge’s report and recommendation in a Social Security disability case. The court grants the Commissioner’s motion for summary judgment, denies the plaintiff’s motion, and affirms the Commissioner’s final decision denying disability insurance benefits and Supplemental Security Income.

CASE DETAILS

COURT	United States District Court for the Eastern District of Virginia, Alexandria Division
JURISDICTION	United States District Court for the Eastern District of Virginia, Alexandria Division
DECIDED	March 18, 2026
DOCKET	1:25-cv-400 (RDA/LRV)
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) and § 1383(c)(3) of the Commissioner's final decision denying disability insurance benefits and Supplemental Security Income. The parties filed cross-motions for summary judgment, and a magistrate judge issued a Report and Recommendation recommending affirmance.
STANDARD OF REVIEW	When no objections are filed to a magistrate judge's report and recommendation, the district court need not conduct de novo review and must only satisfy itself that there is no clear error on the face of the record before accepting the recommendation.
PRECEDENTIAL VALUE	Unpublished district court order; limited precedential value
PARTIES	Anthony W. v. Frank J. Bisignano, Commissioner of Social Security

TOPICS

- judicial review of agency action
- administrative law
- summary judgment
- civil procedure

PRACTICE AREAS

Social Security

Administrative Law

Civil Procedure

QUESTIONS PRESENTED

1. Whether the court should adopt the magistrate judge's Report and Recommendation when no party filed objections and the court found no clear error on the face of the record.
2. Whether the Commissioner's final decision denying Plaintiff disability insurance benefits and Supplemental Security Income should be affirmed.

HOLDINGS

1. When no objections are filed to a magistrate judge's recommendation, the district court need not conduct de novo review and may accept the recommendation after satisfying itself that there is no clear error on the face of the record.
2. The Commissioner's final decision denying Plaintiff disability insurance benefits and Supplemental Security Income is affirmed.

KEY QUOTATIONS

“need not conduct a de novo review, but instead must ‘only satisfy itself that there is no clear error on the face of the record in order to accept the recommendation’”

FACTUAL BACKGROUND

Anthony W. sought disability insurance benefits and Supplemental Security Income under the Social Security Act. The Social Security Administration's Administrative Law Judge and Appeals Council determined that he was not disabled as defined by the Act and applicable regulations. The district court reviewed the Commissioner's final decision and the magistrate judge's recommendation after the parties filed cross-motions for summary judgment.

PROCEDURAL HISTORY

The Administrative Law Judge and Appeals Council determined that Plaintiff was not disabled under the Social Security Act and applicable regulations. Plaintiff filed this action for judicial review and moved for summary judgment; Defendant filed a cross-motion. Magistrate Judge Lindsey R. Vaala recommended denying Plaintiff's motion, granting Defendant's motion, and affirming the Commissioner's decision. No objections were filed, and the district court adopted the Report and Recommendation after finding no clear error.

DISPOSITION

affirmed

CASES CITED

- Diamond v. Colonial Life & Accident Insurance Co., 416 F.3d 310, 315 (4th Cir. 2005)

