

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MICHIGAN

Isaac K. v. Commissioner of Social Security

Isaac K. · No. 25-10742 · Decided March 10, 2026

SUMMARY

The United States District Court for the Eastern District of Michigan adopted the magistrate judge’s Report and Recommendation in an action challenging the denial of supplemental security income. The court denied the plaintiff’s motion for summary judgment, granted the Commissioner’s motion, and affirmed the Commissioner’s decision that the plaintiff was not disabled.

CASE DETAILS

COURT	United States District Court for the Eastern District of Michigan
WRITING FOR THE COURT	Shalina D. Kumar
JURISDICTION	United States District Court for the Eastern District of Michigan
DECIDED	March 10, 2026
DOCKET	25-10742
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review of the Commissioner's denial of supplemental security income and moved for summary judgment. The magistrate judge recommended denial of plaintiff's motion, grant of the Commissioner's motion, and affirmance of the Commissioner's decision. The district court reviewed the unobjected-to Report and Recommendation for clear error, adopted it, denied plaintiff's motion, granted the Commissioner's motion, and affirmed.
STANDARD OF REVIEW	For an unobjected-to Report and Recommendation, the court reviewed the record for clear error and found none.
PRECEDENTIAL VALUE	Unknown
PARTIES	Isaac K. v. Commissioner of Social Security

TOPICS

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

PRACTICE AREAS

Social Security

administrative law

civil procedure

QUESTIONS PRESENTED

1. Whether the district court should adopt the magistrate judge's Report and Recommendation when neither party filed timely objections.
2. Whether the Commissioner's decision denying plaintiff supplemental security income should be affirmed.

HOLDINGS

1. When neither party files a timely objection to a magistrate judge's Report and Recommendation, the district court need not conduct de novo review and may review the recommendation for clear error before accepting it.
2. The Commissioner's decision that plaintiff was not disabled under section 1614(a)(3)(A) of the Social Security Act is affirmed.

KEY QUOTATIONS

"Judgment shall issue in favor of the Commissioner, AFFIRMING the Commissioner's decision that plaintiff is not disabled under section 1614(a)(3)(A) of the Act." (3)

FACTUAL BACKGROUND

Isaac K. applied for supplemental security income under the Social Security Act. The Commissioner denied the application, determining that plaintiff was not disabled under section 1614(a)(3)(A) of the Act. Plaintiff sought judicial review and challenged the denial, but the district court affirmed the Commissioner's decision after finding no clear error in the magistrate judge's recommendation.

PROCEDURAL HISTORY

Plaintiff filed an action challenging the final decision denying their application for supplemental security income. The matter was referred to Magistrate Judge Kimberly G. Altman for pretrial proceedings, and both parties moved for summary judgment. The magistrate judge issued a Report and Recommendation on February 10, 2026. Neither party filed objections, and the district court found no clear error, adopted the recommendation, and entered judgment for the Commissioner.

DISPOSITION

affirmed

CASES CITED

- Thomas v. Arn, 474 U.S. 140, 150 (1985)
- Smith v. Detroit Fed'n of Teachers, 829 F.2d 1370, 1373-74 (6th Cir. 1987)

- *Lardie v. Birkett*, 221 F. Supp. 2d 806, 807 (E.D. Mich. 2002)

OPINION

Kincaid

PER CURIAM.

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF MICHIGAN

SOUTHERN DIVISION

ISAAC K.,

Plaintiff, Case No. 25-10742 v. Honorable Shalina D. Kumar Magistrate Judge Kimberly G. Altman

COMMISSIONER OF SOCIAL
SECURITY,

Defendant.

OPINION AND ORDER ADOPTING REPORT AND
RECOMMENDATION (ECF NO. 16); DENYING PLAINTIFF’S MOTION
FOR SUMMARY JUDGMENT (ECF NO. 12); GRANTING
COMMISSIONER’S MOTION FOR SUMMARY JUDGMENT (ECF NO.
14); AND AFFIRMING THE COMMISSIONER’S DECISION

Plaintiff Isaac K.¹ appeals the final decision of defendant Commissioner of Social Security (the “Commissioner”), challenging the denial of their application for supplemental security income (“SSI”) under the Social Security Act. ECF No. 1. Pursuant to E.D. Mich. LR 72.1(b)(3), this matter was referred for all pretrial matters to the assigned magistrate judge. ECF No. 11. Both parties filed motions for summary judgment. ECF Nos. 12, 14. 1 Consistent with guidance regarding privacy concerns in Social Security cases by the Judicial Conference Committee on Court Administration and Case Management, this district has adopted a policy to identify plaintiffs by only their first names and last initials. See also Fed. R. Civ. P. 5.2(c)(2)(B). Page 1 of 3 On February 10, 2026, the magistrate judge issued a Report and Recommendation (“R&R”). ECF No. 16. The R&R recommends that plaintiff’s motion be denied; the Commissioner’s motion be granted; and the Commissioner’s decision be affirmed. *Id.* Neither party filed objections to the R&R and the time to do so has expired. See Fed. R. Civ. P. 72(b)(2). The failure to file a timely objection to an R&R constitutes a waiver of the right for further judicial review. See *Thomas v. Arn*, 474 U.S. 140, 150 (1985) (“It does not appear that Congress intended to require district court review of a magistrate’s factual or legal conclusion, under a de novo or any other standard, when neither party objects to those findings”); *Smith v. Detroit Fed’n of Teachers*, 829 F.2d 1370, 1373–74 (6th Cir. 1987) (failure to file objection to R&R “waived subsequent review of the matter”); *Lardie v. Birkett*, 221 F. Supp. 2d 806, 807 (E.D. Mich. 2002) (“As to the part of the report and recommendation to which no party has objected, the Court need not conduct a review by any

standard.”). However, there is some authority that a district court is required to review the R&R for clear error. See Fed. R. Civ. P. 72 Advisory Committee Note Subdivision (b) (“When no timely objection is filed, the court need only satisfy itself that there is no clear error on the face of the Page 2 of 3 record in order to accept the recommendation.”). Therefore, the Court has reviewed the R&R for clear error and finds none. Accordingly, the Court ADOPTS the R&R (ECF No. 16), DENIES plaintiff’s motion for summary judgment (ECF No. 12), and GRANTS the Commissioner’s motion for summary judgment (ECF No. 14). Judgment shall issue in favor of the Commissioner, AFFIRMING the Commissioner’s decision that plaintiff is not disabled under section 1614(a)(3)(A) of the Act. IT IS SO ORDERED. s/ Shalina D. Kumar

SHALINA D. KUMAR

Dated: March 10, 2026 United States District Judge Page 3 of 3