

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MINNESOTA

September L. v. Frank Bisignano

September L. · No. 25-cv-331 (LMP/ECW) · Decided February 23, 2026

SUMMARY

The United States District Court for the District of Minnesota adopted a magistrate judge's Report and Recommendation in an action seeking review of the Commissioner of Social Security's denial of disability insurance benefits. The court granted the plaintiff's request for remand, denied the Commissioner's request to dismiss the complaint, and remanded the matter under sentence four of 42 U.S.C. § 405(g) for further administrative proceedings.

CASE DETAILS

COURT	United States District Court for the District of Minnesota
WRITING FOR THE COURT	Laura M. Provinzino
JURISDICTION	United States District Court for the District of Minnesota
DECIDED	February 23, 2026
DOCKET	25-cv-331 (LMP/ECW)
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review of the Commissioner's final decision denying disability insurance benefits. The district court reviewed and adopted an unobjected-to magistrate judge's Report and Recommendation recommending remand.
STANDARD OF REVIEW	Clear-error review of an unobjected-to Report and Recommendation.
PRECEDENTIAL VALUE	Unpublished district court order; precedential status not stated.
PARTIES	September L. v. Frank Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action administrative law civil procedure remedies

PRACTICE AREAS

administrative law Social Security disability benefits federal civil procedure

QUESTIONS PRESENTED

1. Whether the district court should adopt the magistrate judge's Report and Recommendation when neither party filed objections.
2. Whether the Commissioner's final decision denying disability insurance benefits should be remanded for further administrative proceedings.

HOLDINGS

1. When neither party objects to a magistrate judge's Report and Recommendation, the district court reviews the recommendation for clear error and may adopt it in full if no error is found.
2. The Commissioner's decision is remanded pursuant to sentence four of 42 U.S.C. § 405(g) for further administrative proceedings addressing September L.'s nonsevere mental impairments and other asserted errors.

KEY QUOTATIONS

“This matter is REMANDED to the Commissioner pursuant to sentence four of 42 U.S.C. § 405(g) for further administrative proceedings consistent with the R&R (ECF No. 14).”

FACTUAL BACKGROUND

The Commissioner issued a final decision denying September L.'s application for disability insurance benefits. The district court remanded because the Commissioner was required to account for September L.'s nonsevere mental impairments and address her other asserted errors.

PROCEDURAL HISTORY

September L. filed an action seeking review of the Commissioner's denial of her application for disability insurance benefits and requested remand. Magistrate Judge Elizabeth Cowan Wright recommended granting remand and denying the Commissioner's request to dismiss the complaint. Neither party objected, and the district court reviewed the Report and Recommendation for clear error, adopted it in full, denied dismissal, and remanded for further administrative proceedings.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The matter is remanded to the Commissioner pursuant to sentence four of 42 U.S.C. § 405(g) for further administrative proceedings consistent with the Report and Recommendation. The Commissioner must account for September L.'s nonsevere mental impairments and address her other claims of error.

CASES CITED

- *Grinder v. Gammon*, 73 F.3d 793, 795 (8th Cir. 1996) (per curiam)

OPINION

UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA SEPTEMBER L., Case No. 25-cv-331 (LMP/ECW) Plaintiff, v. ORDER ADOPTING REPORT AND FRANK BISIGNANO, Commissioner of RECOMMENDATION Social Security, Defendant. Plaintiff September L. brought this action to seek judicial review of a final decision by the Commissioner of Social Security, Defendant Frank Bisignano (the “Commissioner”), denying her application for disability insurance benefits.

See generally ECF No. 1. September L. asks the Court to vacate the Commissioner’s decision and remand this matter to the Commissioner for further proceedings. See generally ECF No. 8. The Commissioner opposes September L.’s request for relief and asks the Court to affirm the Commissioner’s decision. See generally ECF No. 10.

After receiving briefing from the parties, United States Magistrate Judge Elizabeth Cowan Wright issued a Report and Recommendation (“R&R”) on January 29, 2026, recommending that September L.’s request for remand be granted and that the Commissioner’s request to dismiss the complaint be denied. ECF No. 14 at 44. Neither party has filed objections to the R&R, so the Court reviews it for clear error.

See *Grinder v. Gammon*, 73 F.3d 793, 795 (8th Cir. 1996) (per curiam). Having reviewed the R&R, the Court finds no error and adopts it in full. Accordingly, based on the foregoing, and on all the files, records, and proceedings in this matter, IT IS HEREBY ORDERED that: 1.

The R&R (ECF No. 14) is ADOPTED; 2. September L.’s request for remand of the Commissioner’s decision (ECF Nos. 8, 11) is GRANTED; 3. The Commissioner’s request that the complaint be dismissed (ECF No. 10) is DENIED; and 4. This matter is REMANDED to the Commissioner pursuant to sentence four of 42 U.S.C. § 405(g) for further administrative proceedings consistent with the R&R (ECF No. 14).¹ LET JUDGMENT BE ENTERED ACCORDINGLY.

Dated: February 23, 2026 s/Laura M. Provinzino Laura M. Provinzino United States District Judge
1 On remand, the Commissioner is directed to account for September L.’s nonsevere mental impairments and to address the other claims of error she has raised. ECF No. 14 at 43.