

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION

STEPHANIE LYNN STEIGERWALD)	CASE NO.: 1:17-CV-1516
)	
Plaintiff,)	JUDGE JAMES S. GWIN
)	MAGISTRATE JUDGE DAVID RUIZ
v.)	
)	
ANDREW SAUL,)	BRIEF IN RESPONSE TO COURT
COMMISSIONER OF SOCIAL)	INQUIRY REGARDING SETTLEMENT
SECURITY,)	
)	
Defendant. ¹)	

This Court entered final judgment in this case on January 25, 2019. Judgment, ECF No. 89. During the post-judgment status conference on June 12, 2019, the Court asked the Government “to file a brief laying out your best argument as to why you think it’s – you’re prevented from trying to settle [this case] by coming up with a representative amount that would – could be offered to individual plaintiffs.” June 12, 2019 Transcript, ECF No. 127, at 15:17-20. Shortly thereafter, the Court entered an order setting a briefing schedule on “what forecloses settlement as to damages.” ECF No. 124. That order appears to have been prompted by a concern that the windfall-offset recalculations that the Court ordered to be performed within eight months appear to be overly burdensome for the Social Security system. *See* Tr. 9:6-9:14. Defendant submits this brief in response to the Court’s inquiries and, again, urges that the only proper avenue for the Court is to decide the Government’s stay motion and grant a stay as soon as practicable.

¹ Andrew Saul is now the Commissioner of Social Security and is automatically substituted as a party pursuant to Fed. R. Civ. P. 25(d). See also section 205(g) of the Social Security Act, 42 USC § 405(g) (action survives regardless of any change in the person occupying the office of Commissioner of Social Security).

Three principles foreclose settlement on the Court's terms. *First*, because the Government has filed a Notice of Appeal, this Court lacks jurisdiction to modify its judgment or to engage in settlement conferences in this case. This Court only has jurisdiction to enforce or suspend the judgment (including by deciding the pending stay motion) and to address collateral issues (including attorney's fees). Any question regarding whether the Government can, should, or will enter into settlement belongs solely in the Sixth Circuit. That is fatal to any attempt to settle the case before this Court, as the type of settlement that the Court appears to be contemplating is outside of its jurisdiction. In any event, the Court's indications that the recalculation is burdensome to SSA and to the public and that those burdens should be averted only underscore that the only appropriate action is for this Court to immediately stay its judgment.

Second, in its Order granting summary judgment to the plaintiff class, this Court stated that it was entering relief under the Social Security Act's judicial-review provision, 42 U.S.C. § 405(g), by requiring SSA to conduct a windfall-offset recalculation for class members. It did not order SSA to pay "damages," as this Court now contemplates. ECF No. 124. Nor could this Court award damages, as damages are not within the scope of Section 405(g), and there is no relevant waiver of sovereign immunity. Because SSA is not paying damages, "damages" cannot be negotiated. And once again, if this Court is concerned that the form of relief that it has ordered—recalculations as to a 130,000-member class—is too burdensome as compared to some other form of relief, the only correct course of action is to immediately enter a stay.

Third, even assuming this Court both had jurisdiction and the authority to effect a monetary judgment to class members, issuing an average payment to each class member would be inappropriate and inequitable in light of the substantial variance that SSA has identified to date among class members. A substantial percentage of class members—roughly 45% of those

recalculated thus far—will not receive payments at all upon recalculation. Other class members are likely to receive benefits that are far greater than the average lump sum. Settling those claims would deprive some class members of the benefits that everyone—including SSA—agrees they are entitled to, while providing undeserved funds to class members who should receive \$0. In short, issuing average payments would compound, rather than rectify, the error that is the subject of this litigation.

LAW AND ARGUMENT

I. THIS COURT LACKS JURISDICTION TO MODIFY ITS JUDGMENT.

Any question regarding settlement of the class action is no longer within this Court’s jurisdiction. The type of settlement that the Court is contemplating—paying an average amount to class members rather than providing a recalculation—would fundamentally alter the nature of the relief that the Court has granted under the Social Security Act. This Court, however, now lacks jurisdiction to alter its Order because the Government has filed a Notice of Appeal, thus divesting this Court of jurisdiction to modify its judgment. That includes any modification of the relief that the Court has ordered (requiring SSA to conduct windfall offset recalculations) by approving a settlement (requiring SSA to instead make a “representative” payment).

Even though this Court maintains jurisdiction to enforce or stay the judgment or to address collateral issues, it “may not alter or enlarge the scope of its judgment pending appeal.” *City of Cookeville, Tenn. v. Upper Cumberland Elec. Mem. Corp.*, 484 F.3d 380, 394 (6th Cir. 2007), quoting *NLRC v. Cincinnati Bronze, Inc.*, 829 F. 2d 585, 588 (6th Cir. 1987). So long as the case is on appeal to the Sixth Circuit, SSA is required to conduct the recalculations on an individualized basis, which is precisely the remedy that this Court ordered. And to the extent that this Court believes that something other than recalculations is warranted—as it has now suggested—the only

proper avenue is for this Court to enter a stay of the judgment. The Government's second stay motion has now been pending since June 11, 2019, and this Court should act on it immediately.

II. THE REQUIREMENT THAT SSA CONDUCT WINDFALL OFFSET RECALCULATIONS DOES NOT INVOLVE DAMAGES.

In any event, this Court is incorrect that there are “damages” to compromise or to settle. In this lawsuit, Plaintiffs explicitly sought an injunction ordering the recalculation of the windfall offset for all class members, which could result in additional payments (in some cases). Complaint, ECF No. 1, PageID # 21. This Court ordered that relief—for SSA to take steps under the Social Security Act, its implementing regulations, and SSA policies to ensure that class members receive the recalculations that they are entitled—pursuant to 42 U.S.C. § 405(g). As this Court recently concluded, the Court was engaging in judicial review of and “modifying” each class members’ original final benefits determination for a historical period. Op. & Order, ECF No. 101, PageID # 1379.

The Supreme Court has distinguished between money damages—intended to provide a victim with monetary compensation for an injury to his person, property, or reputation—and specific relief, which “may include an order for [...] for the recovery of specific property or monies[.]” *Collin v. Comm'r of Soc. Sec.*, 881 F.3d 427, 429 (6th Cir. 2018), quoting *Bowen v. Massachusetts*, 487 U.S. 879, 893 (1988). “Money damages are thus compensatory relief, which serve as a ‘substitute for a suffered loss, whereas specific remedies are not substitute remedies at all, but attempt to give the plaintiff the very thing to which he was entitled.’” *Id.*, quoting *Bowen*, 487 at 895. A recalculation is a distinct agency action and a form of specific relief. Even though certain class members *may* ultimately receive additional benefits, the “fact that a judicial remedy may require one party to pay money to another is not a sufficient reason to characterize the relief

as ‘money damages,’” and indeed many class members who obtain recalculations will receive \$0 in additional payments. *Bowen v. Massachusetts*, 487 U.S. 879, 893-94 (1988).

Nor could this lawsuit ever involve damages. Setting aside that Plaintiffs never requested “damages” in their Complaint, there are no damages available under Section 405(g) and no waiver of sovereign immunity permitting the agency to pay monetary damages under the Social Security Act. *See Giesse v. Sec’y of Dep’t of Health & Human Servs.*, 522 F.3d 697, 703–04 (6th Cir. 2008). That is fatal to any attempt to view this case as one involving damages, because sovereign immunity may be waived *only* by Congress via legislation, not the agency via conduct in litigation. *See, Collin v. Comm’r of Soc. Sec.*, 881 F.3d 427, 429 (6th Cir. 2018) (emphasis added); *see also Muniz-Muniz v. U.S. Border Patrol*, 741 F.3d 668, 671 (6th Cir. 2013). In any case, the agency is only permitted to spend money where authorized, and the agency is not authorized provide payment in contravention of its rules under the Social Security Act, nor where no underpayment is due. *See, Office of Pers. Mgmt. v. Richmond*, 496 U.S. 414, 424 (1990) (“Money may be paid out only through an appropriation made by law; in other words, the payment of money from the Treasury must be authorized by a statute.”); *see also*, 42 U.S.C. § 404(a)(1)(B)(imposing a mandatory duty to adjust incorrect payments). In short, because this case does not involve “damages,” any settlement constituting damages is—by definition—foreclosed. And to the extent that this Court believes that the type of relief that it ordered—recalculations for the approximately 130,000 class members—is incorrect or overly burdensome, the only proper action for the Court to take at this point is to stay its judgment.

III. IN ANY EVENT, PROVIDING AN AVERAGE PAYMENT WOULD BE INEQUITABLE TO THE CLASS MEMBERS.

Even if this Court still had jurisdiction over this case, modifying the relief to provide an average payment to each class member would be inappropriate. The obligations at issue in this

case are designed to ensure that a recipient of Society Security disability benefits does not receive a windfall—in other words, a beneficiary receives no more and no less than what they are actually owed under the Social Security Act. The windfall offset provision of the Act, 42 U.S.C. § 1320a-6, prevents an individual who receives retroactive Title II benefits from receiving a greater benefit than would have been received had the benefits been paid in the months in which they were due. *See Guadamuz v. Bowen*, 859 F.2d 762, 764 (9th Cir. 1988) (42 U.S.C. § 1320a-6 enacted to remedy the “windfall” problem where, if the claimant received Title XVI benefits first and later received a retroactive award of Title II benefits for the same period, he would have received a “windfall.”)

Critically, a recalculation of the windfall offset to account for later-authorized representatives’ fees does not always result in an underpayment. As indicated in Defendant’s most recent status report to the Court, of the 2,240 recalculations completed as of June 19, 2019, 961 cases—nearly half—did not result in an underpayment. Status Report, ECF No. 130. As for the 1,250 class members whose benefits were owed payments, there is an enormous variation in the amount of the underpayment, as illustrated in the attached data. *See*, Distribution of Payments, Exhibit A. For example, while the average underpayment has been \$832.06,² more than 328 recalculations have resulted in underpayments of over \$2,000, with several underpayments of over \$10,000. *See* Details of Notices Released, Exhibit B.

Class members are entitled to the recalculation that was litigated in this case; asking a class member who may be entitled to, say, \$10,000 to settle for a fraction of that entitlement would be unlawful and inequitable in light of SSA’s statutory and regulatory obligations. Just as

² As calculated by total dollar value of all payments made, including the \$0 value payments, divided by the number of recalculations performed.

importantly, providing payments to class members who were already properly paid (and therefore are entitled to \$0 in additional benefits) would be extraordinarily wasteful, especially considering that a significant percentage of the class, roughly 45% of the recalculations performed thus far, fall within that category. And there is no interest in class members receiving inaccurate payments generally. Nor is an average amount what the class members were provided notice of in their class notice, which specified that they may receive *recalculations* (not an unspecified monetary amount) as a result of the class action. *See*, Approved Notice, ECF No. 80-1, PageID # 1025-26. Each of these concerns highlight that an average payment would be inequitable in these circumstances, even if the Court's present order imposes substantial harms on the Social Security system. Plaintiff's proposal does nothing to alleviate these inequities: because it is impossible to predict the entitlement to or amount of any underpayment without actually recalculating the windfall offset, class members are not able to make an informed decision whether to accept an average payment.

CONCLUSION

This Court has expressed concern regarding the burdens to the Social Security system imposed by its Order. Since a Notice of Appeal has been filed, the Court nonetheless lacks jurisdiction to modify its Order or otherwise approve a settlement in this case, and the only proper avenue for this Court to take to lift those burdens is to grant the Government's still-pending stay motion. And in any event, the Government has concluded that settling this case on the terms that the Court has contemplated would be unlawful and unfair to class members.

Respectfully submitted,

JUSTIN E. HERDMAN

United States Attorney
Northern District of Ohio

s/Ruchi V. Asher

RUCHI V. ASHER (#0090917)
Assistant United States Attorneys
400 United States Court House
801 West Superior Avenue
Cleveland, Ohio 44113-1852
(216) 622-6719
(216) 522-4982 – Facsimile
Ruchi.Asher@usdoj.gov

JOSEPH H. HUNT

Assistant Attorney General

BRAD P. ROSENBERG

Assistant Director, Federal Programs Branch

JUSTIN M. SANDBERG (Ill. Bar # 6278377)

Senior Trial Counsel

KATE BAILEY (Member, MD Bar)

Trial Attorney

United States Department of Justice

Civil Division, Federal Programs Branch

20 Massachusetts Ave. NW

Washington, DC 20530

(202) 514-9239 (phone)

(202) 616-8470 (fax)

Justin.Sandberg@usdoj.gov

Kate.Bailey@usdoj.gov

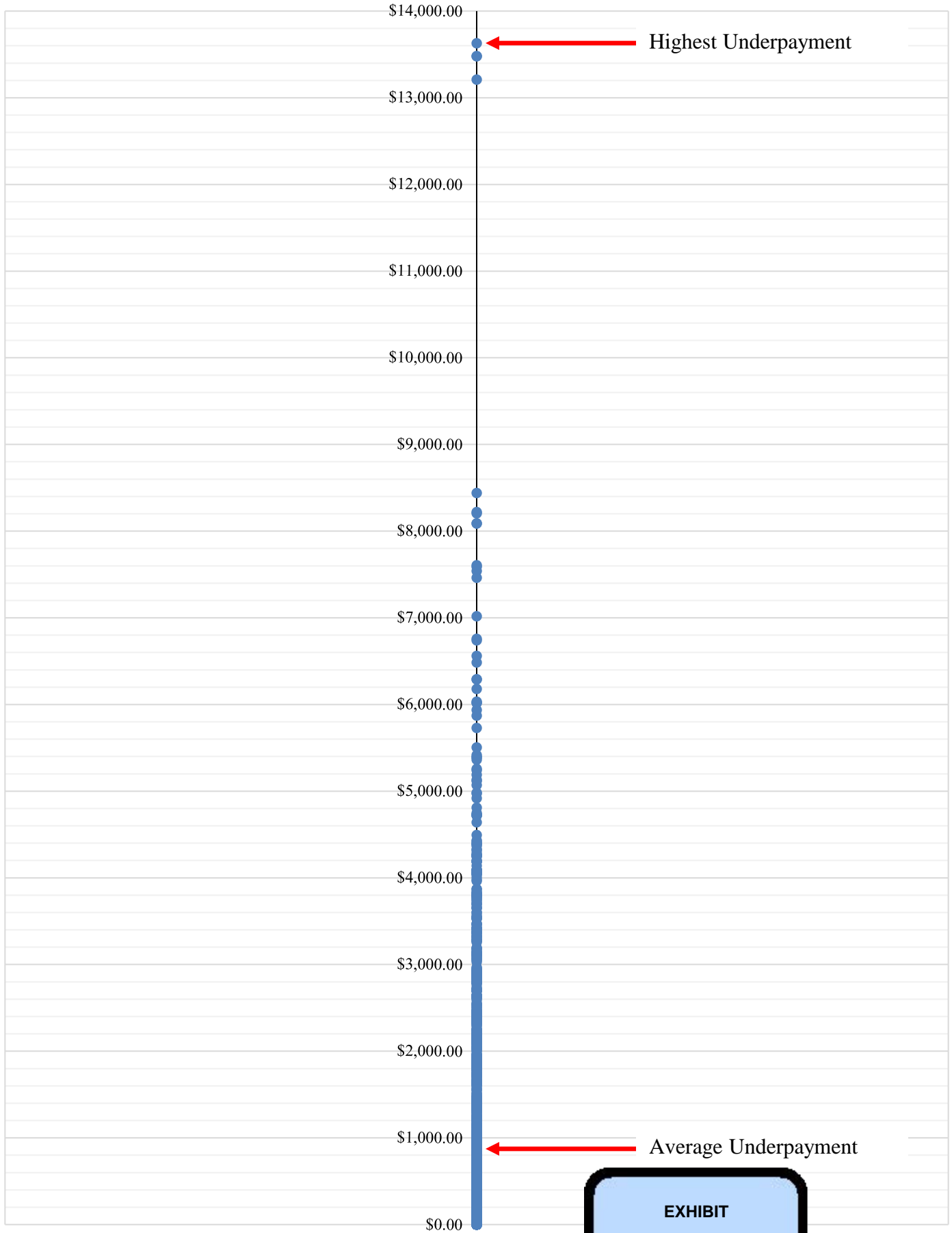
CERTIFICATE OF SERVICE

I hereby certify that on this 24th day of June, 2019, a copy of the foregoing Brief in Response to Court Inquiry Regarding Settlement was filed electronically. Notice of this filing will be sent to all parties by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/Ruchi V. Asher

Ruchi V. Asher, Assistant U.S. Attorney

Distribution of Underpayments As of June 19, 2019



**EXHIBIT
A**

Details of Notices Released

As of June 19, 2019

U/P Amount	O/P Amount	Category
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\$0.00	\$5,913.71	O/P
\$0.00	\$4,543.00	O/P
\$0.00	\$3,583.00	O/P
\$0.00	\$3,538.68	O/P
\$0.00	\$3,137.50	O/P
\$0.00	\$2,696.04	O/P
\$0.00	\$2,254.70	O/P
\$0.00	\$2,205.00	O/P
\$0.00	\$2,094.00	O/P
\$0.00	\$2,030.00	O/P
\$0.00	\$2,024.67	O/P
\$0.00	\$1,941.32	O/P
\$0.00	\$1,717.80	O/P
\$0.00	\$1,396.02	O/P
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Average UP	\$832.06
Median UP	\$345.67
Standard Deviation of UP	246.4683173
Total UP	\$1,863,813.59
Total OP	\$48,042.68

EXHIBIT

B

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\$0.00	\$0.00	No U/P or O/P

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\$1,420.00	\$0.00	U/P

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\$2,443.35	\$0.00	U/P
\$2,443.35	\$0.00	U/P
\$2,443.35	\$0.00	U/P
\$2,443.35	\$0.00	U/P
\$2,443.35	\$0.00	U/P
\$2,443.35	\$0.00	U/P
\$2,443.35	\$0.00	U/P
\$2,443.35	\$0.00	U/P
\$2,443.35	\$0.00	U/P
\$2,443.35	\$0.00	U/P
\$2,443.35	\$0.00	U/P
\$2,446.43	\$0.00	U/P
\$2,452.80	\$0.00	U/P
\$2,454.96	\$0.00	U/P
\$2,458.00	\$0.00	U/P
\$2,462.20	\$0.00	U/P
\$2,462.56	\$0.00	U/P
\$2,470.00	\$0.00	U/P

\$2,473.00	\$0.00	U/P
\$2,500.68	\$0.00	U/P
\$2,504.64	\$0.00	U/P
\$2,517.00	\$0.00	U/P
\$2,534.00	\$0.00	U/P
\$2,538.00	\$0.00	U/P
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\$2,622.03	\$0.00	U/P
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\$2,792.00	\$0.00	U/P
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\$2,792.04	\$0.00	U/P
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\$3,328.04	\$0.00	U/P
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\$3,370.00	\$0.00	U/P
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\$3,594.72	\$0.00	U/P
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\$3,650.44	\$0.00	U/P
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\$3,658.72	\$0.00	U/P
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\$4,326.03	\$0.00	U/P
\$4,366.97	\$0.00	U/P
\$4,386.00	\$0.00	U/P
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\$4,639.79	\$0.00	U/P
\$4,718.00	\$0.00	U/P
\$4,718.00	\$0.00	U/P
\$4,725.40	\$0.00	U/P
\$4,725.40	\$0.00	U/P
\$4,728.00	\$0.00	U/P
\$4,748.06	\$0.00	U/P
\$4,809.65	\$0.00	U/P
\$4,918.74	\$0.00	U/P
\$4,974.74	\$0.00	U/P
\$4,982.99	\$0.00	U/P
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\$5,728.40	\$0.00	U/P
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\$5,937.41	\$0.00	U/P
\$6,017.42	\$0.00	U/P
\$6,019.39	\$0.00	U/P
\$6,033.10	\$0.00	U/P
\$6,180.10	\$0.00	U/P
\$6,290.76	\$0.00	U/P
\$6,290.76	\$0.00	U/P
\$6,485.46	\$0.00	U/P
\$6,560.00	\$0.00	U/P
\$6,740.00	\$0.00	U/P
\$6,758.53	\$0.00	U/P
\$7,016.75	\$0.00	U/P
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\$7,588.08	\$0.00	U/P
\$7,606.00	\$0.00	U/P
\$8,088.00	\$0.00	U/P
\$8,088.12	\$0.00	U/P
\$8,204.86	\$0.00	U/P
\$8,220.29	\$0.00	U/P
\$8,439.99	\$0.00	U/P
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\$13,478.80	\$0.00	U/P
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\$13,628.76	\$0.00	U/P