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# In *Employee Relations Law Journal*: What Happens When ERISA Disability Deadlines Slip

**Publications**

June 23, 2026
By: Joseph Torres, Emma O'Connor, Chris LeWarne

Partner Joseph Torres along with Associates Emma O'Connor and Christopher LeWarne, authored an article for the *Employee Relations Law Journal* analyzing a significant Fourth Circuit decision with substantial consequences for ERISA disability plan administrators.

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The article examines *Cogdell v. Reliance Standard Life Insurance Co.*, in which the Fourth Circuit affirmed that a plan administrator's failure to meet its 45-day appeal deadline, without valid special circumstances, triggers de novo review in federal court, stripping the administrator of the deferential standard it would otherwise enjoy.

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## Related Capabilities

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