

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

R.W. v. Commissioner of Social Security

R.W. · No. 25-cv-02302-EMC · Decided December 3, 2025

SUMMARY

The United States District Court for the Northern District of California reviews the Commissioner of Social Security’s denial of R.W.’s applications for disability insurance benefits and supplemental security income. The court rejects R.W.’s arguments that the ALJ failed to develop the record, improperly declined to order a consultative psychological examination, and inadequately evaluated medical opinions. The court denies R.W.’s request for reversal and remand.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Edward M. Chen
JURISDICTION	United States District Court for the Northern District of California
DECIDED	December 3, 2025
DOCKET	25-cv-02302-EMC
DISPOSITION	other
PROCEDURAL POSTURE	R.W. sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying his Title II disability insurance benefits and Title XVI supplemental security income claims.
STANDARD OF REVIEW	The court reviews the Commissioner's decision for legal error and substantial evidence, considers the record as a whole, and must uphold the decision when the evidence supports more than one rational interpretation.
PRECEDENTIAL VALUE	Unknown
PARTIES	R.W. v. Commissioner of Social Security

TOPICS

- judicial review of agency action
- administrative law
- exhaustion of remedies
- disability definition

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the ALJ failed to discharge the duty to develop the record by not obtaining pre-2014 medical evidence or ordering a consultative psychological examination.
2. Whether the ALJ properly evaluated the supportability and consistency of medical opinions under the revised Social Security regulations.
3. Whether the ALJ adequately evaluated R.W.'s subjective symptom testimony.
4. Whether the ALJ improperly failed to conduct a written function-by-function assessment of all seven strength demands under SSR 96-8p.
5. Whether any error in determining that R.W. could perform his past relevant work required remand despite the ALJ's alternative step-five finding.

HOLDINGS

1. The ALJ did not fail to develop the record because the duty is triggered only by ambiguous evidence or an inadequate record, and the record was adequate to evaluate R.W.'s claims.
2. The ALJ adequately considered both supportability and consistency in evaluating the medical opinions and administrative medical findings.
3. The ALJ properly discounted portions of R.W.'s subjective symptom testimony because she provided clear and convincing reasons supported by substantial evidence.
4. The ALJ was not required to separately enumerate each of the seven strength demands in the written decision, and any omission was harmless.
5. Any error in treating R.W.'s past work as comparable to an automobile-detailer position was harmless because the ALJ alternatively found that other jobs existed in significant numbers that R.W. could perform.

KEY QUOTATIONS

“Social Security proceedings are inquisitorial rather than adversarial, and therefore an ALJ has a duty to investigate the facts and develop the arguments both for and against granting benefits.” (Discussion § B)

“The absence of a psychological consultative exam did not render the medical record incomplete in view of the medical records available to and reviewed by the ALJ.” (Discussion § B.2)

“However, the ALJ did include supportability analysis in her decision.” (Discussion § C.2)

“In sum, the ALJ cited clear and convincing reasons supported by substantial evidence justifying her decision not to fully credit R.W.’s testimony regarding his limitations.” (Discussion § D)

FACTUAL BACKGROUND

R.W. applied for disability insurance benefits and SSI, alleging physical impairments and later presenting evidence of learning or developmental disability, anxiety, depression, bipolar disorder, and schizoaffective disorder. His date last insured for Title II benefits was March 31, 2014, but the record contained no medical examinations or evaluations from before 2017. The ALJ found severe impairments for purposes of the SSI claim but determined that R.W. retained the capacity for simple medium work with limited interaction and could perform past relevant work or other work existing in significant numbers.

PROCEDURAL HISTORY

An ALJ initially denied benefits in May 2022. The Appeals Council vacated that decision and remanded for further consideration of the residual functional capacity, evaluation of medical opinions, and completion of the record. After a second hearing, the ALJ again denied benefits in March 2024, and the Appeals Council affirmed. The district court denied R.W.'s request for reversal and remand and directed entry of judgment for the Commissioner.

DISPOSITION

other

CASES CITED

- Moore v. Barnhart, 405 F.3d 1208, 1211 (11th Cir. 2005)
- Obrien v. Bisignano, 142 F.4th 687, 693 (9th Cir. 2025)
- Mayes v. Massanari, 276 F.3d 453, 459 (9th Cir. 2001)
- Burch v. Barnhart, 400 F.3d 676, 680-81 (9th Cir. 2005)
- Sims v. Apfel, 530 U.S. 103, 110-11 (2000)
- Celaya v. Halter, 332 F.3d 1177, 1183 (9th Cir. 2003)
- McLeod v. Astrue, 640 F.3d 881, 885 (9th Cir. 2011)
- Salazar v. Barnhart, 180 F. App'x 39, 50 (10th Cir. 2006)
- Castle v. Colvin, 557 F. App'x 849, 853 (11th Cir. 2014)
- Wellington v. Berryhill, 878 F.3d 867, 874 (9th Cir. 2017)
- Loaiza v. Commissioner of Social Security, No. 2:23-cv-01964-CKD, 2024 U.S. Dist. LEXIS 132536, at *9 (E.D. Cal. July 25, 2024)
- Torres v. Commissioner of Social Security, No. 2:19-CV-1246-DMC, 2020 U.S. Dist. LEXIS 181273, at *19-20 (E.D. Cal. Sept. 30, 2020)
- Sprague v. Brown, 812 F.2d 1226, 1232 (9th Cir. 1987)
- Lester v. Chater, 81 F.3d 821, 833 (9th Cir. 1995)
- Woods v. Kijakazi, 32 F.4th 785, 792-93 & n.4 (9th Cir. 2022)
- Ferguson v. O'Malley, 95 F.4th 1194, 1199-1200 (9th Cir. 2024)
- Smartt v. Kijakazi, 53 F.4th 489, 498-99 (9th Cir. 2022)
- Carmickle v. Commissioner, SSA, 533 F.3d 1155, 1162 (9th Cir. 2008)

- Orn v. Astrue, 495 F.3d 625, 639 (9th Cir. 2007)
- Delgado v. Commissioner of Social Security, 30 F. App'x 542, 547-48 (6th Cir. 2002)
- Simmons v. Saul, No. 18-cv-1293 (JDB/GMH), 2019 U.S. Dist. LEXIS 238124, at *44 (D.D.C. Sept. 30, 2019)
- Knox v. Astrue, 327 F. App'x 652, 657 (7th Cir. 2009)
- Depover v. Barnhart, 349 F.3d 563, 567-68 (8th Cir. 2003)

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