

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
WASHINGTON

Jennifer S. v. Acting Commissioner of Social Security

No. 2:24-cv-01674-TLF (W.D. Wash. Dec. 14, 2026) · No. 2:24-cv-01674-TLF · Decided January 14, 2026

SUMMARY

The United States District Court for the Western District of Washington affirmed the Acting Commissioner of Social Security’s denial of Jennifer S.’s application for supplemental security income for the period from February 21, 2020, through January 4, 2023. The court held that the administrative law judge adequately evaluated the medical opinions and the plaintiff’s subjective symptom testimony and that the residual functional capacity determination was supported by substantial evidence.

CASE DETAILS

COURT	United States District Court for the Western District of Washington
WRITING FOR THE COURT	Theresa L. Fricke
JURISDICTION	United States District Court for the Western District of Washington
DECIDED	January 14, 2026
DOCKET	2:24-cv-01674-TLF
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Acting Commissioner’s denial of her application for supplemental security income. The parties consented to magistrate-judge jurisdiction under 28 U.S.C. § 636(c), Federal Rule of Civil Procedure 73, and Local Rule MJR 13.
STANDARD OF REVIEW	Under 42 U.S.C. § 405(g), the court may set aside the Commissioner’s denial of benefits only if the ALJ’s findings are based on legal error or are not supported by substantial evidence in the record as a whole. The court must consider the administrative record as a whole, weigh both supporting and contrary evidence, and review only the reasons identified by the ALJ.
PRECEDENTIAL VALUE	Unknown
PARTIES	Jennifer S. v. Acting Commissioner of Social Security

TOPICS

judicial review of agency action

agency adjudication

administrative law

PRACTICE AREAS

Social Security disability

administrative law

federal judicial review

QUESTIONS PRESENTED

1. Whether the ALJ properly evaluated the medical opinions of Dr. T. C. Portman, Dr. Melanie Edwards Mitchell, and counselor Rebecca McClinton under the applicable 2017 Social Security regulations.
2. Whether the ALJ properly discounted plaintiff's subjective statements about the severity of her symptoms and limitations.
3. Whether the ALJ's residual functional capacity determination was supported by substantial evidence.

HOLDINGS

1. The ALJ did not harmfully err in finding the opinions of Dr. Portman and Dr. Mitchell unpersuasive. The ALJ appropriately considered that the opinions predated the relevant disability period and also relied on additional reasons, including their check-box format, lack of supporting explanation, inconsistency with mental-status findings, and Dr. Mitchell's limited review of the record.
2. The ALJ did not harmfully err in finding Rebecca McClinton's statement unpersuasive because it did not describe plaintiff's abilities on a function-by-function basis, relied on subjective symptoms without supporting evidence, was inconsistent with longitudinal treatment records, and included a conclusory opinion on the ultimate issue of disability.
3. The ALJ properly discounted plaintiff's statements about the severity of her symptoms and limitations because her reported daily activities were inconsistent with her allegations of debilitating limitations.
4. The ALJ's residual functional capacity determination was supported by substantial evidence, and the ALJ was not required to include limitations based on evidence the ALJ properly found unpersuasive.

KEY QUOTATIONS

"Medical opinions that predate the alleged onset of disability are of limited relevance." (AR 2989)

"An error that is inconsequential to the non-disability determination is harmless." (AR 2991)

FACTUAL BACKGROUND

Jennifer S. applied for supplemental security income on February 21, 2020, alleging disability beginning July 1, 2003, later amended to the application date. During the relevant period, the ALJ found numerous severe impairments, including mental disorders, diabetes with neuropathy, obesity, spinal and joint conditions, and asthma. The ALJ determined that plaintiff retained the capacity for a restricted range of light work with simple tasks, limited social interaction, and other postural, environmental, and reaching restrictions. The court relied on plaintiff's reported daily activities, including caring for a friend, helping her landlord, walking, exercising, and pursuing a driver's license, in evaluating the ALJ's treatment of her symptom testimony.

PROCEDURAL HISTORY

Plaintiff applied for SSI, and her application was denied initially and on reconsideration. After a 2022 hearing, an ALJ found her not disabled; the Appeals Council denied review. The district court previously reversed and remanded for further proceedings. Following a second hearing, a different ALJ again found plaintiff not disabled for the relevant period, and the Appeals Council declined review. The court affirmed the ALJ's decision.

DISPOSITION

affirmed

CASES CITED

- Jennifer S. v. Commissioner of Social Security, 2023 WL 6233914 (W.D. Wash. Sept. 26, 2023)
- Revels v. Berryhill, 874 F.3d 648, 654 (9th Cir. 2017)
- Biestek v. Berryhill, 139 S. Ct. 1148, 1153-54 (2019)
- Garrison v. Colvin, 759 F.3d 995, 1009-10 (9th Cir. 2014)
- Woods v. Kijakazi, 32 F.4th 785, 792 (9th Cir. 2022)
- Seaich v. Kijakazi, 2022 WL 17430269 (9th Cir. Dec. 6, 2022)
- Whitehead v. Saul, 830 F. App'x 173, 174 (9th Cir. 2020)
- Carmickle v. Commissioner, Social Security Administration, 533 F.3d 1155, 1161, 1165 (9th Cir. 2008)
- Sekiya v. Gates, 508 F.3d 1198, 1200 (9th Cir. 2007)
- Independent Towers of Washington v. Washington, 350 F.3d 925, 929-31 (9th Cir. 2003)
- Raven E. v. Commissioner of Social Security, 2022 WL 445663, at *2 (W.D. Wash. Feb. 14, 2022)
- Molina v. Astrue, 674 F.3d 1104, 1111 (9th Cir. 2012)
- Smith v. Marsh, 194 F.3d 1045, 1052 (9th Cir. 1999)
- Pickett v. King, 2024 WL 5398771, at *2 (9th Cir. Feb. 10, 2025)
- Philpot v. Bisignano, 2025 WL 2452054, at *1 (9th Cir. Aug. 26, 2025)
- Ford v. Saul, 950 F.3d 1141, 1155-56 (9th Cir. 2020)
- Morgan v. Commissioner of Social Security Administration, 169 F.3d 595, 601 (9th Cir. 1999)
- Burrell v. Colvin, 775 F.3d 1133, 1138 (9th Cir. 2014)
- Reddick v. Chater, 157 F.3d 715, 722 (9th Cir. 1998)
- Rashad v. Sullivan, 903 F.2d 1229, 1231 (9th Cir. 1990)
- Ghanim v. Colvin, 763 F.3d 1154, 1163-64 (9th Cir. 2014)
- Lingenfelter v. Astrue, 504 F.3d 1028, 1036 (9th Cir. 2007)
- Johnson v. Shalala, 60 F.3d 1428, 1434 (9th Cir. 1995)
- Bunnell v. Sullivan, 947 F.2d 341, 345 (9th Cir. 1991)
- Byrnes v. Shalala, 60 F.3d 639, 641-42 (9th Cir. 1995)
- Orn v. Astrue, 495 F.3d 625, 639 (9th Cir. 2007)
- Stout v. Commissioner, Social Security Administration, 454 F.3d 1050, 1054-55 (9th Cir. 2006)

- Bayliss v. Barnhart, 427 F.3d 1211, 1217 (9th Cir. 2005)

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