

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
WASHINGTON

Melissa H. v. Frank Bisignano, Commissioner of Social Security

Melissa H. · No. No. 1:25-CV-03040-JAG · Decided March 23, 2026

SUMMARY

The United States District Court for the Eastern District of Washington affirmed the Commissioner of Social Security's decision denying Melissa H.'s applications for Disability Insurance Benefits and Supplemental Security Income. The court held that the Administrative Law Judge's evaluation of her subjective statements and residual functional capacity was supported by substantial evidence and free of legal error.

CASE DETAILS

COURT	United States District Court for the Eastern District of Washington
WRITING FOR THE COURT	James A. Goeke
JURISDICTION	United States District Court for the Eastern District of Washington
DECIDED	March 23, 2026
DOCKET	No. 1:25-CV-03040-JAG
DISPOSITION	affirmed
PROCEDURAL POSTURE	Judicial review of the Commissioner's final decision denying Disability Insurance Benefits and Supplemental Security Income.
STANDARD OF REVIEW	The court reviews the ALJ's legal determinations de novo and determines whether the decision is supported by substantial evidence and free of legal error. The court may not substitute its judgment for the ALJ's where the evidence is susceptible to more than one rational interpretation.
PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	Melissa H. v. Frank Bisignano, Commissioner of Social Security

TOPICS

- judicial review of agency action
- administrative law

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether substantial evidence and proper legal standards supported the ALJ's evaluation of the plaintiff's subjective symptom testimony.
2. Whether the ALJ's residual functional capacity assessment was required to include additional limitations based on the plaintiff's testimony concerning standing, walking, lying down to control pain, and lifting.

HOLDINGS

1. The ALJ properly rejected aspects of the plaintiff's subjective symptom testimony because, absent evidence of malingering, the ALJ gave specific, clear, and convincing reasons supported by the medical record, the plaintiff's statements to providers, consultative examinations, and daily activities.
2. The RFC was not required to include limitations arising solely from symptom testimony that the ALJ reasonably rejected.
3. The ALJ's decision denying benefits was supported by substantial evidence and was not based on legal error.

KEY QUOTATIONS

"The decision of the ALJ may be reversed only if it is not supported by substantial evidence or if it is based on legal error." (at 4)

"Absent affirmative evidence of malingering, the ALJ's reasons for rejecting the claimant's testimony must be 'specific, clear and convincing.'" (at 5)

"However, where the ALJ reasonably rejected symptom testimony, the RFC need not conform accommodate those symptoms." (at 6)

FACTUAL BACKGROUND

Melissa H. alleged disability based on osteoarthritis, hypertension, depression, anxiety, hearing loss, bilateral carpal tunnel syndrome, possible Huntington's disease, sleep apnea, and other pain-related conditions. The ALJ found severe impairments including lumbar degenerative disc disease, bilateral carpal tunnel syndrome, right-ear hearing loss, obesity, major depressive disorder, and generalized anxiety disorder. The ALJ found that she could perform a limited range of light work and, although unable to perform her past work as a convenience store clerk, could perform jobs such as routing clerk, marker, and collator operator.

PROCEDURAL HISTORY

Melissa H. applied for Disability Insurance Benefits and Supplemental Security Income, alleging disability beginning June 1, 2021 after amending her alleged onset date at the administrative hearing. The ALJ denied benefits on March 20, 2024, and the Appeals Council denied review. The plaintiff sought review in the district court, which affirmed the ALJ's decision and denied remand.

DISPOSITION

affirmed

CASES CITED

- Andrews v. Shalala, 53 F.3d 1035, 1039 (9th Cir. 1995)
- McNatt v. Apfel, 201 F.3d 1084, 1087 (9th Cir. 2000)
- Tackett v. Apfel, 180 F.3d 1094, 1097-99 (9th Cir. 1999)
- Richardson v. Perales, 402 U.S. 389, 401 (1971)
- Morgan v. Commissioner of Social Security Administration, 169 F.3d 595, 599 (9th Cir. 1999)
- Sprague v. Bowen, 812 F.2d 1226, 1229-30 (9th Cir. 1987)
- Brawner v. Secretary of Health and Human Services, 839 F.2d 432, 433 (9th Cir. 1988)
- Bowen v. Yuckert, 482 U.S. 137, 140-42 (1987)
- Batson v. Commissioner of Social Security Administration, 359 F.3d 1190, 1193-94 (9th Cir. 2004)
- Rashad v. Sullivan, 903 F.2d 1229, 1231 (9th Cir. 1990)
- Reddick v. Chater, 157 F.3d 715, 722 (9th Cir. 1998)
- Smolen v. Chater, 80 F.3d 1273, 1281 (9th Cir. 1996)
- Lester v. Chater, 81 F.3d 821, 834 (9th Cir. 1995)
- Dodrill v. Shalala, 12 F.3d 915, 918 (9th Cir. 1993)
- Rollins v. Massanari, 261 F.3d 853, 857 (9th Cir. 2001)
- Valentine v. Commissioner of Social Security Administration, 574 F.3d 685, 691-92 (9th Cir. 2009)

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