

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Justin N. v. Frank Bisignano, Commissioner of Social Security

No. 5:24-cv-02023-JC (C.D. Cal. Oct. 1, 2025) · No. 5:24-cv-02023-JC · Decided October 1, 2025

SUMMARY

The United States District Court for the Central District of California reviewed the Commissioner of Social Security’s denial of Justin N.’s application for Supplemental Security Income. The court held that the Administrative Law Judge did not materially err in failing to separately address the plaintiff’s headaches and that substantial evidence supported the residual functional capacity for light work. The court affirmed the Commissioner’s decision.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Jacqueline Chooljian
JURISDICTION	United States District Court for the Central District of California
DECIDED	October 1, 2025
DOCKET	5:24-cv-02023-JC
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's denial of Supplemental Security Income benefits. The parties filed cross-briefs, and the matter was submitted without oral argument.
STANDARD OF REVIEW	The court may set aside the Commissioner's final decision only if it is based on legal error or is not supported by substantial evidence. Review is highly deferential, and the decision must be upheld if the evidence reasonably supports either affirmance or reversal. An error is harmless if it is inconsequential to the ultimate nondisability determination or if the ALJ's reasoning can reasonably be discerned.
PRECEDENTIAL VALUE	unpublished
PARTIES	Justin N. v. Frank Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

disability definition

PRACTICE AREAS

Social Security disability

administrative law

federal judicial review

QUESTIONS PRESENTED

1. Whether the ALJ materially erred by failing to identify or evaluate Plaintiff's headaches at steps two and three of the sequential evaluation and in determining his RFC.
2. Whether substantial evidence supported the ALJ's RFC finding that Plaintiff could perform light work, which generally implies up to six hours of standing or walking in an eight-hour workday.
3. Whether the ALJ was required to further develop the record or obtain additional medical evidence to reconcile conflicting portions of a consultative examiner's opinion.
4. Whether any error concerning the standing-and-walking limitation was harmless because vocational-expert testimony identified a significant number of sedentary jobs Plaintiff could perform.

HOLDINGS

1. The ALJ's failure to expressly address Plaintiff's headaches did not constitute material error because Plaintiff did not establish a medically determinable headache disorder or show that the headaches caused additional functional limitations not accounted for in the RFC.
2. Substantial evidence supported the ALJ's finding that Plaintiff could perform light work with additional limitations, including the generally applicable six-hour standing-and-walking capacity.
3. The ALJ was not required to further develop the record because the evidence was not so ambiguous or inadequate as to prevent proper evaluation, and the ALJ's explanation was adequate under the applicable standard.
4. Any error in finding that Plaintiff could stand or walk for six hours rather than four hours, or in failing to further develop the record on that issue, was harmless because the vocational expert identified a significant number of sedentary jobs Plaintiff could perform.

KEY QUOTATIONS

"Based on the record as a whole and the applicable law, the decision of the Commissioner is AFFIRMED."
(at 3)

"The findings of the Administrative Law Judge ("ALJ") are supported by substantial evidence and are free from material error." (at 3)

"A federal court may set aside a denial of benefits only when the Commissioner's "final decision" was "based on legal error or not supported by substantial evidence in the record."" (at 6)

"Plaintiff had the burden of proving that his headaches affected his ability to perform basic work activities, and substantial evidence supports a conclusion that Plaintiff did not meet that burden." (at 11)

“An ALJ’s duty to develop the record further is triggered only when there is ambiguous evidence or when the record is inadequate to allow for proper evaluation of the evidence.” (at 16)

FACTUAL BACKGROUND

Plaintiff alleged disability based primarily on mental-health conditions and various physical impairments, including COPD, pancreatitis, cirrhosis, polyneuropathy, and headaches. On remand, the ALJ found that Plaintiff had multiple severe impairments but retained the residual functional capacity for light work with postural, environmental, mental, and social limitations, and could perform office helper, retail pricer, and small-products assembler jobs. Plaintiff argued that the ALJ failed to account for his headaches and lacked substantial evidence for the implied six-hour standing-and-walking capacity. The court found that the record did not establish a medically determinable headache disorder or additional functional limitations and that substantial evidence supported the RFC determination.

PROCEDURAL HISTORY

Plaintiff applied for SSI on December 10, 2019. An ALJ denied the application on December 2, 2021, and the Appeals Council denied review on March 16, 2022. In an earlier federal action, the court remanded the matter by stipulation for further proceedings. On remand, the ALJ again found Plaintiff not disabled on May 17, 2024, and the Appeals Council denied review on July 26, 2024, making the ALJ's decision final. The court affirmed the Commissioner's decision.

DISPOSITION

affirmed

CASES CITED

- *Molina v. Astrue*, 674 F.3d 1104, 1110 (9th Cir. 2012)
- *Sisk v. Saul*, 820 F. App'x 604, 606 (9th Cir. 2020)
- *Tackett v. Apfel*, 180 F.3d 1094, 1098, 1100-01 (9th Cir. 1999)
- *Stout v. Commissioner, Social Security Administration*, 454 F.3d 1050, 1052 (9th Cir. 2006)
- *Burch v. Barnhart*, 400 F.3d 676, 679 (9th Cir. 2005)
- *Trevizo v. Berryhill*, 871 F.3d 664, 674-75 (9th Cir. 2017)
- *Rounds v. Commissioner of Social Security Administration*, 807 F.3d 996, 1002 (9th Cir. 2015)
- *Treichler v. Commissioner of Social Security Administration*, 775 F.3d 1090, 1099 (9th Cir. 2014)
- *Garrison v. Colvin*, 759 F.3d 995, 1009 (9th Cir. 2014)
- *Brown-Hunter v. Colvin*, 806 F.3d 487, 492 (9th Cir. 2015)
- *Marsh v. Colvin*, 792 F.3d 1170, 1173 (9th Cir. 2015)
- *Ukolov v. Barnhart*, 420 F.3d 1002, 1004-05 (9th Cir. 2005)
- *Bowen v. Yuckert*, 482 U.S. 137, 148 (1987)
- *Webb v. Barnhart*, 433 F.3d 683, 686 (9th Cir. 2005)

- *Bray v. Commissioner of Social Security Administration*, 554 F.3d 1219, 1224 (9th Cir. 2009)
- *Cooper v. Sullivan*, 880 F.2d 1152, 1155 n.5 (9th Cir. 1989)
- *Lewis v. Astrue*, 498 F.3d 909, 911 (9th Cir. 2007)
- *Valentine v. Commissioner of Social Security Administration*, 574 F.3d 685, 690 (9th Cir. 2009)
- *Heckler v. Campbell*, 461 U.S. 458, 461-62 (1983)
- *Zavalin v. Colvin*, 778 F.3d 842, 845-46 (9th Cir. 2015)
- *Gutierrez v. Colvin*, 844 F.3d 804, 806-07 (9th Cir. 2016)
- *Osenbrock v. Apfel*, 240 F.3d 1157, 1162, 1165 (9th Cir. 2001)
- *Hill v. Astrue*, 698 F.3d 1153, 1161-62 (9th Cir. 2012)
- *Embrey v. Bowen*, 849 F.2d 418, 422 (9th Cir. 1988)
- *Robbins v. Social Security Administration*, 466 F.3d 880, 886 (9th Cir. 2006)
- *Mayes v. Massanari*, 276 F.3d 453, 459-60 (9th Cir. 2001)
- *Moncada v. Chater*, 60 F.3d 521, 524 (9th Cir. 1995)
- *Tommasetti v. Astrue*, 533 F.3d 1035, 1038 (9th Cir. 2008)
- *Graham v. Commissioner of Social Security*, 441 F. App'x 487, 489 (9th Cir. 2011)
- *Willard v. Saul*, 2021 WL 2073737, at *7 (E.D. Cal. May 24, 2021)
- *Jenkins v. Astrue*, 815 F. Supp. 2d 1145, 1154 (D. Or. 2011), *aff'd*, 497 F. App'x 757 (9th Cir. 2012)
- *Lowery v. Colvin*, 2014 WL 183892, at *4 (D. Or. Jan. 14, 2014)