

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Lasharee Devona Williams v. Commissioner of Social Security

Williams · No. 1:24-cv-00375-HBK · Decided March 25, 2025

SUMMARY

The United States District Court for the Eastern District of California reviewed the Commissioner of Social Security’s denial of Lasharee Devona Williams’s applications for supplemental security income and disability insurance benefits. The court denied Plaintiff’s motion for summary judgment, granted the Commissioner’s motion for summary judgment, and affirmed the Commissioner’s decision, concluding that the ALJ’s RFC assessment and evaluation of the medical opinions, symptom claims, and lay witness evidence were supported by substantial evidence.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Helena M. Barch-Kuchta
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	March 25, 2025
DOCKET	1:24-cv-00375-HBK
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. §§ 405(g) and 1383(c) (3) of the Commissioner's final decision denying supplemental security income and disability insurance benefits. The parties filed cross-motions for summary judgment without oral argument.
STANDARD OF REVIEW	Under 42 U.S.C. § 405(g), the court may disturb the Commissioner's decision only if it is unsupported by substantial evidence or based on legal error. Substantial evidence is relevant evidence that a reasonable mind might accept as adequate, more than a mere scintilla but less than a preponderance. The court must consider the record as a whole, may not substitute its judgment for the Commissioner's, and must uphold the ALJ's conclusion when the evidence is susceptible to more than one rational interpretation. Harmless error does not warrant reversal.
PRECEDENTIAL VALUE	Unknown; unpublished district court order

PARTIES

Lasharee Devona Williams v. Commissioner of Social Security

TOPICS

judicial review of agency action

agency adjudication

administrative law

PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ's residual functional capacity determination was supported by substantial evidence, including the evaluation of medical opinion evidence.
2. Whether the ALJ properly evaluated Williams's subjective symptom claims.
3. Whether the ALJ properly considered the lay witness evidence.

HOLDINGS

1. The ALJ properly evaluated Carmen Sorisho's medical opinion under the revised Social Security regulations and reasonably formulated an RFC limiting Williams to light work with simple instructions, supervisor instructions, and restricted coworker and public interactions.
2. The ALJ provided clear and convincing, substantial-evidence-supported reasons for discounting Williams's subjective symptom claims.
3. The ALJ did not err by considering but not separately explaining the treatment of the lay witness report because the applicable regulations do not require articulation of how evidence from nonmedical sources was considered.

KEY QUOTATIONS

“A district court’s review of a final decision of the Commissioner of Social Security is governed by 42 U.S.C. § 405(g). The scope of review under § 405(g) is limited; the Commissioner’s decision will be disturbed “only if it is not supported by substantial evidence or is based on legal error.”” (Section III)

“Under the new regulations, nonmedical sources—including lay testimony from friends and family—are still considered in determining the “consistency” of “medical opinion(s) or prior administrative medical finding(s).”” (Section VII.C)

FACTUAL BACKGROUND

Williams alleged disability beginning February 8, 2018, based on physical pain, numbness, mobility limitations, depression, anxiety, and related symptoms. The ALJ found severe impairments including obesity, lumbar degenerative disc disease, left-knee degenerative joint disease, major depressive disorder, and panic disorder, but determined that Williams retained the residual functional capacity for restricted light work with simple-instruction and limited-interaction restrictions. The ALJ found she could not perform past relevant work but

could perform other jobs existing in significant numbers in the national economy, including routing clerk, marking clerk, and hotel housekeeper.

PROCEDURAL HISTORY

Plaintiff's applications were denied initially and on reconsideration. After an ALJ denied benefits and the Appeals Council denied review, the Central District of California granted a stipulated voluntary remand on April 29, 2022. The Appeals Council then vacated the ALJ's decision and ordered further proceedings; following a new hearing, the ALJ again denied benefits on January 18, 2024. The Eastern District of California denied Plaintiff's motion for summary judgment, granted the Commissioner's cross-motion, affirmed the Commissioner's decision, and directed the Clerk to close the case.

DISPOSITION

affirmed

CASES CITED

- Hill v. Astrue, 698 F.3d 1153, 1158-59 (9th Cir. 2012)
- Tommasetti v. Astrue, 533 F.3d 1035, 1038, 1040 (9th Cir. 2008)
- Shinseki v. Sanders, 556 U.S. 396, 409-10 (2009)
- Tackett v. Apfel, 180 F.3d 1094, 1098 (9th Cir. 1999)
- Beltran v. Astrue, 700 F.3d 386, 389 (9th Cir. 2012)
- Bayliss v. Barnhart, 427 F.3d 1211, 1217 (9th Cir. 2005)
- Turner v. Comm'r of Soc. Sec., 613 F.3d 1217, 1222-23 (9th Cir. 2010)
- Vertigan v. Halter, 260 F.3d 1044, 1049 (9th Cir. 2001)
- Woods v. Kijakazi, 32 F.4th 785, 787, 792 (9th Cir. 2022)
- Morgan v. Comm'r of Soc. Sec. Admin., 169 F.3d 595, 601-02 (9th Cir. 1999)
- Robbins v. Soc. Sec. Admin., 466 F.3d 880, 886 (9th Cir. 2006)
- Rounds v. Comm'r of Soc. Sec. Admin., 807 F.3d 996, 1006 (9th Cir. 2015)
- Farlow v. Kijakazi, 53 F.4th 485, 488 (9th Cir. 2022)
- Bufkin v. Saul, 836 Fed. App'x 578, 579 (9th Cir. 2021)
- Lingenfelter v. Astrue, 504 F.3d 1028, 1035-36 (9th Cir. 2007)
- Vasquez v. Astrue, 572 F.3d 586, 591 (9th Cir. 2009)
- Ghanim v. Colvin, 763 F.3d 1154, 1163 (9th Cir. 2014)
- Lester v. Chater, 81 F.3d 821, 834 (9th Cir. 1995)
- Thomas v. Barnhart, 278 F.3d 947, 958 (9th Cir. 2002)
- Garrison v. Colvin, 759 F.3d 995, 1015 (9th Cir. 2014)
- Moore v. Comm'r of Soc. Sec. Admin., 278 F.3d 920, 924 (9th Cir. 2002)
- Rollins v. Massanari, 261 F.3d 853, 857 (9th Cir. 2001)

- Warre v. Comm'r of Soc. Sec. Admin., 439 F.3d 1001, 1006 (9th Cir. 2006)
- Fair v. Bowen, 885 F.2d 597, 603 (9th Cir. 1989)
- Molina v. Astrue, 674 F.3d 1104, 1112-14 (9th Cir. 2012)
- Burch v. Barnhart, 400 F.3d 676, 679 (9th Cir. 2005)
- Brown-Hunter v. Colvin, 806 F.3d 487, 489 (9th Cir. 2015)
- Valentine v. Comm'r Soc. Sec. Admin., 574 F.3d 685, 694 (9th Cir. 2009)
- Johnson v. Kijakazi, 2022 WL 3998572, at *2 (9th Cir. Sept. 2, 2022)
- Hudnall v. Dudek, 2025 WL 729701, at *2-3 (9th Cir. Mar. 7, 2025)
- Carrier v. Kijakazi, 2023 WL 8016706, at *3 (9th Cir. Nov. 20, 2023)
- Kim v. Kang, 154 F.3d 996, 1000 (9th Cir. 1998)
- Carmickle v. Comm'r of Soc. Sec. Admin., 533 F.3d 1155, 1161 n.2 (9th Cir. 2008)
- Teresa P. v. Comm'r of Soc. Sec., 2025 WL 326160, at * (S.D. Cal. Jan. 29, 2025)
- de Gutierrez v. Saul, 2020 WL 5701019, at *6 (E.D. Cal. Sept. 24, 2020)

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