

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

L.G. v. Commissioner of Social Security

L.G. · No. Civil Action No. 25-01432 (ZNQ) · Decided February 27, 2026

SUMMARY

The United States District Court for the District of New Jersey reviewed the denial of L.G.’s applications for Disability Insurance Benefits and Supplemental Security Income. The court held that the Administrative Law Judge’s residual functional capacity assessment and evaluation of Plaintiff’s diabetes, hypoglycemia, anxiety, and social limitations were supported by substantial evidence. The court affirmed the denial of benefits.

CASE DETAILS

COURT	United States District Court for the District of New Jersey
WRITING FOR THE COURT	Zahid N. Quraishi
JURISDICTION	United States District Court for the District of New Jersey
DECIDED	February 27, 2026
DOCKET	Civil Action No. 25-01432 (ZNQ)
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. §§ 405(g) and 1383(c) of the Commissioner of Social Security's denial of Disability Insurance Benefits and Supplemental Security Income. The district court reviewed the administrative record and affirmed the ALJ's decision.
STANDARD OF REVIEW	The district court conducts plenary review of legal issues but must affirm factual findings supported by substantial evidence. It may not reweigh the evidence or substitute its conclusions for those of the ALJ, and the ALJ must explain why probative evidence is rejected.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	L.G. v. Commissioner of Social Security

TOPICS

- judicial review of agency action
- administrative law
- disability definition
- administrative procedure act

PRACTICE AREAS

Social Security

Administrative Law

Disability Benefits

QUESTIONS PRESENTED

1. Whether substantial evidence supported the ALJ's conclusion that Plaintiff's diabetes, hypoglycemic episodes, and anxiety did not require greater RFC limitations.
2. Whether the ALJ properly evaluated Dr. Dhiren Gandhi's medical opinion under the Social Security regulations.
3. Whether the ALJ properly considered Plaintiff's social and other mental limitations in determining the RFC.
4. Whether the ALJ's ultimate finding that Plaintiff was not disabled under the Social Security Act should be affirmed.

HOLDINGS

1. The ALJ properly considered Plaintiff's subjective complaints and the medical evidence, and substantial evidence supported the finding that Plaintiff could perform light work subject to the stated limitations.
2. The ALJ adequately explained why Dr. Gandhi's opinion was unpersuasive and properly considered the supportability and consistency of the medical opinions.
3. The ALJ did not err by declining to impose additional RFC restrictions based on Plaintiff's mild social limitation and, in any event, adequately accounted for Plaintiff's anxiety and ability to interact with others.
4. Plaintiff was not entitled to DIB or SSI because the ALJ properly determined that Plaintiff could perform other work existing in significant numbers in the national economy.

KEY QUOTATIONS

“To survive judicial review, the Commissioner’s decision must be supported by substantial evidence.”
(Section III.A)

“Substantial evidence is “more than a mere scintilla. It means such relevant evidence as a reasonable mind might accept as adequate to support a conclusion.”” (Section III.A)

“The foregoing demonstrates that the ALJ fully considered Plaintiff’s subjective concerns about her anxiety or stress contributing to frequent hypoglycemic episodes as required by 20 C.F.R. § 404.1529(a).” (Section IV)

FACTUAL BACKGROUND

Plaintiff alleged disability beginning July 26, 2021, based principally on insulin-dependent type I diabetes, anxiety, hypoglycemic episodes, shoulder impairments, and related limitations. The ALJ found severe impairments but determined that Plaintiff retained the residual functional capacity for light work with specified postural, environmental, overhead-reaching, and routine-work limitations. The ALJ concluded that Plaintiff

could not perform past relevant work but could perform other work existing in significant numbers in the national economy.

PROCEDURAL HISTORY

Plaintiff filed claims for DIB and SSI, which were denied initially and on reconsideration. Following a telephonic ALJ hearing, the ALJ denied benefits on April 9, 2024. The Appeals Council denied review on January 14, 2025, and Plaintiff filed this action on February 24, 2025. The district court affirmed the ALJ's decision.

DISPOSITION

affirmed

CASES CITED

- *Matthews v. Apfel*, 239 F.3d 589, 592 (3d Cir. 2001)
- *Knepp v. Apfel*, 204 F.3d 78, 83 (3d Cir. 2000)
- *Richardson v. Perales*, 402 U.S. 389, 401 (1971)
- *Morales v. Apfel*, 225 F.3d 310, 316 (3d Cir. 2000)
- *Consol. Edison Co. of N.Y. v. N.L.R.B.*, 305 U.S. 197, 229 (1938)
- *Ginsburg v. Richardson*, 436 F.2d 1146, 1148 (3d Cir. 1971)
- *Laws v. Celebrezze*, 368 F.2d 640, 642 (4th Cir. 1966)
- *Rutherford v. Barnhart*, 399 F.3d 546, 552 (3d Cir. 2005)
- *Fargnoli v. Halter*, 247 F.3d 34, 38 (3d Cir. 2001)
- *Zirnsak v. Colvin*, 777 F.3d 607, 610 (3d Cir. 2014)
- *Schaudeck v. Comm'r of Soc. Sec.*, 181 F.3d 429, 431 (3d Cir. 1999)
- *Cotter v. Harris*, 642 F.2d 700, 706-07 (3d Cir. 1981)
- *Smith v. Comm'r of Soc. Sec.*, 631 F.3d 632, 634 (3d Cir. 2010)
- *Poulos v. Comm'r of Soc. Sec.*, 474 F.3d 88, 92 (3d Cir. 2007)
- *Morris v. Comm'r of Soc. Sec.*, Civ. No. 19-13744, 2020 WL 2764803, at *4 (D.N.J. May 28, 2020)
- *Beety-Monticelli v. Comm'r of Soc. Sec.*, 343 F. App'x 743, 747 (3d Cir. 2009)
- *Chandler v. Comm'r of Soc. Sec.*, 667 F.3d 356, 359 (3d Cir. 2011)
- *Zaborowski v. Comm'r of Soc. Sec.*, 115 F.4th 637, 638 (3d Cir. 2024)
- *Alexander v. Shalala*, 927 F. Supp. 785, 792 (D.N.J. 1995)
- *Danielle G. v. King*, Civ. No. 22-4721, 2025 WL 354448, at *14 (D.N.J. Jan. 31, 2025)
- *D.C. v. Comm'r of Soc. Sec.*, Civ. No. 20-2484, 2021 WL 1851830, at *6 (D.N.J. May 10, 2021)