

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
NEW YORK

Michele D. v. Commissioner of Social Security

No. 5:25-CV-301 (MJK) (N.D.N.Y. Mar. 16, 2026) · No. 5:25-CV-301 (MJK) · Decided March 16, 2026

SUMMARY

The United States District Court for the Northern District of New York reviewed the denial of Michele D.’s application for Social Security disability insurance benefits. The court found that the Administrative Law Judge failed to clearly account for moderate social-interaction limitations in the residual functional capacity assessment, but held that the error was harmless because two identified jobs accommodated those limitations. The court denied the plaintiff’s motion, granted the Commissioner’s motion, affirmed the administrative decision, and dismissed the complaint.

CASE DETAILS

COURT	United States District Court for the Northern District of New York
WRITING FOR THE COURT	Mitchell J. Katz, U.S. Magistrate Judge
JURISDICTION	United States District Court for the Northern District of New York
DECIDED	March 16, 2026
DOCKET	5:25-CV-301 (MJK)
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying disability insurance benefits. The parties' briefs were treated as cross-motions for judgment on the pleadings under Federal Rule of Civil Procedure 12(c).
STANDARD OF REVIEW	The court reviewed whether the Commissioner applied the correct legal standards and whether the decision was supported by substantial evidence, considering the entire administrative record and refraining from substituting its judgment for that of the Commissioner where substantial evidence supported the decision.
PRECEDENTIAL VALUE	unpublished district court memorandum-decision and order
PARTIES	Michele D. v. Commissioner of Social Security

TOPICS

judicial review of agency action

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PRACTICE AREAS

Social Security disability

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QUESTIONS PRESENTED

1. Whether the ALJ erred by finding moderate limitations in interacting with others while failing to expressly include corresponding social-interaction limitations in the RFC.
2. Whether any RFC error was harmless because the jobs identified at step five accommodated moderate social limitations.

HOLDINGS

1. The ALJ erred by failing to clearly identify limitations concerning the claimant's ability to interact with coworkers, supervisors, and the public after finding a moderate limitation in interacting with others.
2. The RFC error was harmless because the jobs identified at step five accounted for moderate limitations in social interaction; accordingly, the Commissioner's denial of benefits was affirmed.

KEY QUOTATIONS

“ALJ Molleur erred when he failed to include social limitations in his RFC but the error was harmless because two of the jobs offered accounted for moderate social limitations.” (T. 37)

“Because those jobs do not require talking, they account for moderate social limitations.” (T. 39)

FACTUAL BACKGROUND

Michele D. alleged disability based on physical and mental impairments, including fibromyalgia, degenerative disc disease, knee injuries, migraines, hearing loss, depression, anxiety, borderline personality disorder, and post-traumatic stress disorder. The ALJ found that she had severe impairments but retained the residual functional capacity for light work with physical, noise, and task-complexity restrictions, including avoidance of tandem or team-oriented work. Although the ALJ found moderate limitations in interacting with others, the RFC did not expressly specify limitations concerning interaction with coworkers, supervisors, or the public. The vocational expert identified three unskilled jobs, two of which did not require talking.

PROCEDURAL HISTORY

Michele D. applied for Title II disability insurance benefits alleging disability beginning May 18, 2018. The Social Security Administration denied the application initially and on reconsideration; after a hearing, an ALJ issued an unfavorable decision on December 17, 2024, and the Appeals Council denied review. The district court denied plaintiff's motion, granted the Commissioner's motion, affirmed the Commissioner's decision, and dismissed the complaint.

DISPOSITION

affirmed

CASES CITED

- *Berry v. Schweiker*, 675 F.2d 464, 467 (2d Cir. 1982)
- *Selian v. Astrue*, 708 F.3d 409, 417-18 (2d Cir. 2013)
- *Brault v. Social Security Administration, Commissioner*, 683 F.3d 443, 448 (2d Cir. 2012)
- *Talavera v. Astrue*, 697 F.3d 145, 151 (2d Cir. 2012)
- *Williams ex rel. Williams v. Bowen*, 859 F.2d 255, 258 (2d Cir. 1988)
- *Rutherford v. Schweiker*, 685 F.2d 60, 62 (2d Cir. 1982)
- *Mongeur v. Heckler*, 722 F.2d 1033, 1040 (2d Cir. 1983)
- *Miles v. Harris*, 645 F.2d 122, 124 (2d Cir. 1981)
- *Cruz v. Barnhart*, 343 F. Supp. 2d 218, 224 (S.D.N.Y. 2004)
- *Fuller v. Astrue*, No. 09-CV-6279, 2010 WL 5072112, at *6 (W.D.N.Y. Dec. 6, 2010)
- *Balles v. Astrue*, No. 3:11-CV-1386 (MAD), 2013 WL 252970, at *2 (N.D.N.Y. Jan. 23, 2013)
- *Melville v. Apfel*, 198 F.3d 45, 52 (2d Cir. 1999)
- *Martone v. Apfel*, 70 F. Supp. 2d 145, 150 (N.D.N.Y.)
- *Genier v. Astrue*, 606 F.3d 46, 49 (2d Cir. 2010)
- *Roat v. Barnhart*, 717 F. Supp. 2d 241, 267 (N.D.N.Y.)
- *Ferraris v. Heckler*, 728 F.2d 582, 587-88 (2d Cir. 1984)
- *Natashia R. v. Berryhill*, No. 3:17-CV-01266 (TWD), 2019 WL 1260049, at *11 (N.D.N.Y. Mar. 19, 2019)
- *Angelo Michael G. v. Kijakazi*, No. 6:22-CV-00892 (TWD), 2023 WL 4763792 (N.D.N.Y. July 26, 2023)
- *Curry v. Commissioner of Social Security*, 855 F. App'x 46, 49 n.3 (2d Cir. 2021)
- *Bruesewitz v. Wyeth LLC*, 562 U.S. 223, 236 (2011)
- *Wightman v. Commissioner of Social Security*, 2019 WL 2610712, at *2 (W.D.N.Y. June 26, 2019)
- *Justine G. v. Commissioner of Social Security*, No. 21-CV-6701S, 2023 WL 2595011, at *4 (W.D.N.Y. Mar. 22, 2023)
- *Reilly v. Colvin*, No. 1:13-cv-00785, 2015 WL 6674955, at *3 (W.D.N.Y. Nov. 2, 2015)
- *Joseph T. v. Commissioner of Social Security*, No. 22-CV-6209, 2024 WL 3228055, at *4 (W.D.N.Y. June 28, 2024)

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