

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
CALIFORNIA

S. T. v. Commissioner of Social Security

Case No. 24-cv-07721-SVK · No. 24-cv-07721-SVK · Decided July 14, 2025

SUMMARY

The United States District Court for the Northern District of California reviewed the Commissioner of Social Security’s denial of Plaintiff’s application for disability insurance benefits. The court found reversible errors in the evaluation of Plaintiff’s subjective symptom testimony and several medical-source opinions, while finding no error in the treatment of one consulting physician’s opinion. The court reversed in part, affirmed in part, and remanded for further proceedings and additional fact-finding concerning the residual functional capacity and available jobs.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Susan van Keulen
JURISDICTION	United States District Court for the Northern District of California
DECIDED	July 14, 2025
DOCKET	24-cv-07721-SVK
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner of Social Security's denial of disability insurance benefits. The parties consented to magistrate-judge jurisdiction and submitted the action for decision on the briefs.
STANDARD OF REVIEW	The court reviews the Commissioner's decision under 42 U.S.C. § 405(g) and will disturb it only if it is unsupported by substantial evidence or based on improper legal standards. The court considers the record as a whole, including evidence supporting and detracting from the agency's conclusion, and upholds rationally supported findings where the evidence is susceptible to more than one rational interpretation. Errors are harmless only if inconsequential to the ultimate nondisability determination or if the agency's path can reasonably be discerned.

PRECEDENTIAL VALUE	Unpublished district court order; persuasive rather than precedential value beyond the case.
PARTIES	S. T. v. Commissioner of Social Security

TOPICS

judicial review of agency action administrative law ada / disability

PRACTICE AREAS

Social Security disability benefits administrative law federal judicial review disability law

QUESTIONS PRESENTED

1. Whether the ALJ gave legally sufficient reasons for discounting Plaintiff's testimony concerning chronic lower-back pain and related functional limitations.
2. Whether the ALJ properly accounted for the moderate mental-work limitations identified by examining psychologist Lauri Stenbeck, Psy.D.
3. Whether the ALJ properly evaluated the standing and walking limitations identified by consulting physician Satish Sharma, M.D.
4. Whether the ALJ was required to address all of the medical opinions identified by Plaintiff's physician Timothy Ong, M.D., and whether any omission was harmless.
5. Whether the ALJ properly resolved alleged conflicts between the vocational expert's testimony and the Dictionary of Occupational Titles.

HOLDINGS

1. The ALJ legally erred by discounting Plaintiff's testimony about the severity of her lower-back pain based on generalized references to less significant objective findings without identifying an actual inconsistency between the testimony and the evidence.
2. The ALJ's error in discounting Plaintiff's lower-back-pain testimony was not harmless.
3. The ALJ erred by failing to include or otherwise account for Dr. Stenbeck's limitations concerning interactions with supervisors and the ability to complete a normal workday or workweek without interruption.
4. The ALJ did not err in finding Dr. Sharma's opinion concerning standing and walking limitations unpersuasive.
5. The ALJ erred by failing to address twelve of Dr. Ong's medical opinions, but the error required remand only for consideration of the opinions concerning recognizing and correcting mistakes or identifying and solving problems, and setting realistic goals.
6. Plaintiff's challenge to alleged conflicts between the vocational expert's testimony and the Dictionary of Occupational Titles was moot because remand required new vocational-expert testimony based on a

corrected RFC.

KEY QUOTATIONS

“When, as here, the ALJ identifies no inconsistency between the objective medical data and a claimant’s subjective symptom testimony, it is not appropriate for the ALJ to reject the testimony solely because the objective medical data do not support the claimant’s testimony.” (§ IV.A.1)

“It is well-established that the ALJ “must articulate how persuasive it finds all of the medical opinions from each doctor or other source.”” (§ IV.B.3)

FACTUAL BACKGROUND

Plaintiff applied for disability insurance benefits and alleged limitations from chronic lower-back pain and mental impairments. The ALJ found severe lumbar degenerative disc disease, degenerative joint disease, obesity, and depression, and formulated an RFC for light work with, among other limitations, a requirement to alternate sitting and standing every 30 minutes. Relying on vocational-expert testimony, the ALJ found that Plaintiff could perform jobs including mail clerk, office helper, and routing clerk. The district court found material errors in the treatment of Plaintiff's symptom testimony and certain medical opinions because the errors could affect the RFC and the availability of work.

PROCEDURAL HISTORY

Plaintiff applied for disability insurance benefits in March 2022. Her claim was denied initially and on reconsideration; following a November 2023 telephonic hearing, the ALJ issued an unfavorable decision on December 15, 2023, and the Appeals Council denied review. The district court reversed in part and affirmed in part the Commissioner's decision and remanded for further proceedings.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remand for further proceedings and fact finding using an RFC consistent with Plaintiff's subjective testimony; account for Dr. Stenbeck's limitations concerning supervisor interactions and completing a normal workday or workweek without interruption; consider Dr. Ong's limitations concerning recognizing and correcting mistakes or identifying and solving problems and setting realistic goals; and obtain new vocational-expert testimony as necessary. The court did not resolve the alleged DOT conflicts because that challenge was moot.

CASES CITED

- Brown-Hunter v. Colvin, 806 F.3d 487, 492, 494 (9th Cir. 2015)
- Biestek v. Berryhill, 587 U.S. 97, 102-03 (2019)
- Rounds v. Comm'r of Soc. Sec. Admin., 807 F.3d 996, 1002 (9th Cir. 2015)
- Trevizo v. Berryhill, 871 F.3d 664, 678 (9th Cir. 2017)

- Smartt v. Kijakazi, 53 F.4th 489, 498-99 (9th Cir. 2022)
- Burch v. Barnhart, 400 F.3d 676, 680-81 (9th Cir. 2005)
- Vidal N. v. O'Malley, No. 8:22-CV-01878-SK, 2024 WL 3529051, at *3 (C.D. Cal. June 4, 2024)
- Sukach v. O'Malley, No. 24-cv-00026-MWJS (WRP), 2024 WL 4565916, at *5 (D. Haw. Oct. 24, 2024)
- Woods v. Kijakazi, 32 F.4th 785, 792-93 (9th Cir. 2022)
- Palleschi v. Colvin, No. 15-cv-4204 JC, 2016 WL 7261400, at *5 (C.D. Cal. Dec. 15, 2016)
- G.F. v. Dudek, No. 24-cv-06077-SVK, 2025 WL 1303956, at *4 (N.D. Cal. May 6, 2025)
- Luther v. Berryhill, 891 F.3d 872, 877 (9th Cir. 2018)

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