

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

W.G. v. Commissioner of Social Security

W.G. · No. Civil Action No. 24-9390 (ZNQ) · Decided December 29, 2025

SUMMARY

The United States District Court for the District of New Jersey reviewed the denial of W.G.’s application for Disability Insurance Benefits under the Social Security Act. The court held that the Administrative Law Judge’s evaluation of the medical opinions and subjective complaints was supported by substantial evidence and 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	December 29, 2025
DOCKET	Civil Action No. 24-9390 (ZNQ)
DISPOSITION	affirmed
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.
STANDARD OF REVIEW	The court conducts plenary review of legal issues and reviews the Commissioner's factual findings for substantial evidence. It may not reweigh the evidence or substitute its own conclusions for those of the ALJ, but the ALJ must adequately explain the reasons for rejecting probative evidence.
PRECEDENTIAL VALUE	unpublished
PARTIES	W.G. v. Commissioner of Social Security

TOPICS

- judicial review of agency action
- agency adjudication
- administrative law
- disability definition

PRACTICE AREAS

- Social Security disability
- administrative law
- judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ properly evaluated the supportability and consistency of the medical opinions of Dr. Glasman and Dr. Mintz under the applicable Social Security regulations.
2. Whether the ALJ adequately explained the RFC determination and its treatment of MRI evidence and the medical record.
3. Whether the ALJ properly evaluated Plaintiff's subjective complaints of pain.
4. Whether any error in the treatment of the state-agency consultants' opinions required reversal.

HOLDINGS

1. The ALJ adequately evaluated the persuasiveness of Dr. Glasman's and Dr. Mintz's opinions by addressing supportability and consistency, and the resulting partial weight determinations were supported by substantial evidence.
2. The ALJ's RFC determination and denial of benefits were supported by substantial evidence, and the court could not reweigh conflicting evidence.
3. The ALJ properly evaluated Plaintiff's subjective complaints by considering the medically determinable impairments, objective evidence, treatment history, medication effects, daily activities, and clinical observations, and reasonably found the complaints unsupported by relevant objective evidence.
4. Any assumed error in assigning partial weight to the state-agency consultants was harmless because their opinions supported a greater exertional capacity than the sedentary RFC ultimately adopted.

KEY QUOTATIONS

“While supported by a lengthy treating relationship related directly to the severe impairments, it is not consistent with the record that showed no deficits in knee range of motion or squatting and consistently normal or independent ambulation without mention of the appearance of discomfort or distress while seated or standing/walking, and again that same rather consistent conservative treatment regimen.” (AR at 21)

“Subjective allegations of pain or other symptoms cannot alone establish a disability.” (AR at 22)

FACTUAL BACKGROUND

Plaintiff alleged disability based on degenerative disc disease of the cervical, thoracic, and lumbar spine, foot arthritis, chronic pain, restricted range of motion, and numbness and tingling. The ALJ found that Plaintiff had severe impairments but retained the residual functional capacity for sedentary work with specified lifting, standing, walking, sitting, and postural limitations. The ALJ discounted portions of opinions from Dr. Glasman and Dr. Mintz because they were unsupported or inconsistent with treatment records showing independent ambulation, preserved range of motion and strength, absence of distress, and conservative treatment. The ALJ also found Plaintiff's subjective complaints inconsistent with the objective record, medication effects, treatment history, and clinical observations.

PROCEDURAL HISTORY

Plaintiff applied for Disability Insurance Benefits in March 2022. The application was denied initially and on reconsideration, after which an administrative law judge held a hearing and denied benefits. Plaintiff filed this action in the District of New Jersey, challenging the ALJ's evaluation of medical opinions and subjective complaints of pain. The court affirmed the denial without oral argument.

DISPOSITION

affirmed

CASES CITED

- *Matthews v. Apfel*, 239 F.3d 589 (3d Cir. 2001)
- *Knepp v. Apfel*, 204 F.3d 78 (3d Cir. 2000)
- *Richardson v. Perales*, 402 U.S. 389 (1971)
- *Consolidated Edison Co. of N.Y. v. N.L.R.B.*, 305 U.S. 197 (1938)
- *Ginsburg v. Richardson*, 436 F.2d 1146 (3d Cir. 1971)
- *Laws v. Celebrezze*, 368 F.2d 640 (4th Cir. 1966)
- *Rutherford v. Barnhart*, 399 F.3d 546 (3d Cir. 2005)
- *Fargnoli v. Massanari*, 247 F.3d 34 (3d Cir. 2001)
- *Zirnsak v. Colvin*, 777 F.3d 607 (3d Cir. 2014)
- *Schaudeck v. Commissioner of Social Security*, 181 F.3d 429 (3d Cir. 1999)
- *Cotter v. Harris*, 642 F.2d 700 (3d Cir. 1981)
- *Smith v. Commissioner of Social Security*, 631 F.3d 632 (3d Cir. 2010)
- *Poulos v. Commissioner of Social Security*, 474 F.3d 88 (3d Cir. 2007)
- *Mercado v. Kijakazi*, 629 F. Supp. 3d 260 (M.D. Pa. 2022)
- *Michelle R. Q. v. Bisignano*, Civ. No. 22-4770, 2025 WL 2983156, at *5 (E.D. Pa. Oct. 22, 2025)
- *Biestek v. Berryhill*, 587 U.S. 97 (2019)
- *Pizarro v. Colvin*, 208 F. Supp. 3d 669 (E.D. Pa. 2016)
- *Cecil Z. v. Commissioner of Social Security*, Civ. No. 24-10936, 2025 WL 2910185, at *7 (D.N.J. Oct. 14, 2025)
- *Tedesco v. Commissioner of Social Security*, 833 F. App'x 957 (3d Cir. 2020)
- *Miller v. Commissioner of Social Security*, 719 F. App'x 130 (3d Cir. 2017)
- *Van Horn v. Schweiker*, 717 F.2d 871 (3d Cir. 1983)
- *Perkins v. Barnhart*, 79 F. App'x 512 (3d Cir. 2003)