

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Andrea K. v. Commissioner of Social Security

Andrea K. · No. Civil Action No. EA-25-1237 · Decided April 16, 2026

SUMMARY

The United States District Court for the District of Maryland affirms the Commissioner of Social Security’s denial of Andrea K.’s application for Supplemental Security Income. The court rejects the claimant’s argument that the Administrative Law Judge improperly relied on lay opinion in assessing residual functional capacity and concludes that substantial evidence supported the step-five vocational finding.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Erin Aslan
JURISDICTION	United States District Court for the District of Maryland
DECIDED	April 16, 2026
DOCKET	Civil Action No. EA-25-1237
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under the Social Security Act of the Commissioner's final decision denying her application for Supplemental Security Income benefits.
STANDARD OF REVIEW	The court must affirm the Commissioner's decision if the agency applied correct legal standards and its factual findings are supported by substantial evidence. The court may not reweigh evidence or substitute its judgment for that of the Commissioner.
PRECEDENTIAL VALUE	Unknown; memorandum opinion with no reporter citation
PARTIES	Andrea K. v. Commissioner of Social Security

TOPICS

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

PRACTICE AREAS

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

QUESTIONS PRESENTED

1. Whether the ALJ improperly substituted a lay medical opinion for medical evidence when assessing Plaintiff's residual functional capacity.
2. Whether the ALJ's step-five finding was unsupported by substantial evidence because the vocational expert's job numbers allegedly did not correspond to the cited occupations.

HOLDINGS

1. The ALJ did not impermissibly play doctor or substitute a lay opinion for medical expertise. The ALJ properly evaluated the medical and other evidence, explained why the state-agency opinions were unpersuasive, and independently assessed residual functional capacity as required by the regulations.
2. The ALJ did not err in finding that work existed in significant numbers in the national economy that Plaintiff could perform. Even accepting Plaintiff's estimates and excluding the allegedly obsolete nut-sorter occupation, the remaining jobs substantially exceeded numbers previously accepted as significant.

KEY QUOTATIONS

“The key consideration is whether the ALJ identified the evidence relied upon in determining the claimant’s residual functional capacity and built “an accurate and logical bridge from the evidence to that conclusion.””

“In sum, the ALJ did not err in finding that jobs exist in significant numbers in the national economy that Plaintiff can perform.”

FACTUAL BACKGROUND

Plaintiff alleged disability based on vision loss, scoliosis, arthritis, insomnia, anxiety, depression, and bipolar disorder. The ALJ found severe impairments consisting of obesity, bipolar disorder, adjustment disorder, situational depression, and anxiety, but determined that Plaintiff retained the residual functional capacity for restricted light work. Based on vocational-expert testimony, the ALJ found that jobs existed in significant numbers in the national economy that Plaintiff could perform.

PROCEDURAL HISTORY

Plaintiff applied for Supplemental Security Income on February 2, 2021. The SSA denied the application initially and on reconsideration. After a February 7, 2024 hearing, an Administrative Law Judge found Plaintiff not disabled on April 1, 2024, and the Appeals Council denied review on March 3, 2025. Plaintiff filed this action on April 16, 2025, and the court affirmed the Commissioner's decision.

DISPOSITION

affirmed

CASES CITED

- Craig v. Chater, 76 F.3d 585, 589 (4th Cir. 1996)

- *Sims v. Apfel*, 530 U.S. 103, 106-107 (2000)
- *Delk v. Colvin*, 675 F. App'x 281, 282 (4th Cir. 2017)
- *Barnhart v. Thomas*, 540 U.S. 20, 21 (2003)
- *Britt v. Saul*, 860 F. App'x 256, 257, 259, 262 (4th Cir. 2021)
- *Hancock v. Astrue*, 667 F.3d 470, 472 (4th Cir. 2012)
- *Pass v. Chater*, 65 F.3d 1200, 1203 (4th Cir. 1995)
- *Mascio v. Colvin*, 780 F.3d 632, 634-37 (4th Cir. 2015)
- *Monroe v. Colvin*, 826 F.3d 176, 179, 187-89 (4th Cir. 2016)
- *Coffman v. Bowen*, 829 F.2d 514, 517 (4th Cir. 1987)
- *Hays v. Sullivan*, 907 F.2d 1453, 1456 (4th Cir. 1990)
- *Biestek v. Berryhill*, 587 U.S. 97, 102-03 (2019)
- *Consolidated Edison Co. v. NLRB*, 305 U.S. 197, 229 (1938)
- *Laws v. Celebrezze*, 386 F.2d 640, 642 (4th Cir. 1967)
- *Sterling Smokeless Coal Co. v. Akers*, 131 F.3d 438, 439-40 (4th Cir. 1997)
- *T-Mobile S., LLC v. City of Roswell*, 574 U.S. 293, 302 (2015)
- *Garland v. Ming Dai*, 593 U.S. 357, 369 (2021)
- *Arakas v. Commissioner, Social Security Administration*, 983 F.3d 83, 108 (4th Cir. 2020)
- *Lewis v. Berryhill*, 858 F.3d 858, 869 (4th Cir. 2017)
- *Marshall v. Berryhill*, 2017 WL 1196488, at *4-*5 (D. Md. Mar. 31, 2017)
- *Tonya B. v. Kijakazi*, 2021 WL 3291513, at *4 (D. Md. Aug. 2, 2021)
- *Kimberly C. v. Kijakazi*, 2021 WL 5449069, at *5 (D. Md. Nov. 22, 2021)
- *Demetrius J. v. Saul*, 2019 WL 7037956, at *4-*5 (D. Md. Dec. 20, 2019)
- *Dunn v. Colvin*, 607 F. App'x 264, 267 (4th Cir. 2015)
- *Pearson v. Colvin*, 810 F.3d 204, 205 n.1, 207 (4th Cir. 2015)
- *Clarence M. v. Commissioner, Social Security Administration*, 2022 WL 958473, at *5 (D. Md. Mar. 30, 2022)
- *Hodges v. Apfel*, 203 F.3d 820 (4th Cir. 2000)
- *Hyatt v. Apfel*, 153 F.3d 720 (4th Cir. 1998)
- *Lawler v. Astrue*, 2011 WL 1485280, at *5 (D. Md. Apr. 19, 2011)
- *Hicks v. Califano*, 600 F.2d 1048, 1051 n.2 (4th Cir. 1979)
- *Howard W. v. O'Malley*, 2024 WL 1194488, at *4 (D. Md. Mar. 20, 2024)
- *Leggett v. Commissioner, Social Security Administration*, 2013 WL 1352298, at *3 (D. Md. Apr. 2, 2013)
- *Autumn T. v. Saul*, 2020 WL 4194145, at *3 (D. Md. July 21, 2020)