

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

Munguia v. Commissioner of Social Security

No. 24-cv-06297-NC (N.D. Cal. May 29, 2025) · No. 24-cv-06297-NC · Decided May 29, 2025

SUMMARY

The United States District Court for the Northern District of California reviewed an Administrative Law Judge’s denial of Social Security disability benefits to S.M. The court held that the ALJ improperly evaluated medical opinions and evidence and failed to consider small fiber neuropathy at step three, including whether it met or equaled Listing 11.14. The court reversed the ALJ’s decision and remanded for further consideration and proceedings rather than ordering an immediate award of benefits.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Nathanael M. Cousins
JURISDICTION	United States District Court for the Northern District of California
DECIDED	May 29, 2025
DOCKET	24-cv-06297-NC
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Claimant sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying Social Security disability benefits.
STANDARD OF REVIEW	The court reviews the Commissioner's decision for substantial evidence and legal error. An error is harmless if it is inconsequential to the ultimate nondisability determination or the agency's path can reasonably be discerned.
PRECEDENTIAL VALUE	Unpublished district-court order; precedential status unknown
PARTIES	S.M. v. Commissioner of Social Security

TOPICS

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

PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

disability benefits

QUESTIONS PRESENTED

1. Whether the ALJ legally erred by rejecting all medical opinions concerning S.M.'s physical impairments without adequately addressing their supportability, consistency, and evidentiary basis.
2. Whether the ALJ legally erred by failing to consider several medical opinions entirely.
3. Whether the ALJ legally erred by failing to consider S.M.'s small fiber neuropathy at later steps of the sequential evaluation, including Listing 11.14 at step three.
4. Whether the ALJ's errors were harmless.
5. Whether the case warranted remand for an immediate award of benefits rather than further administrative proceedings.

HOLDINGS

1. The ALJ erred by effectively assigning no weight to every medical opinion concerning S.M.'s physical impairments and by substituting his own interpretation of the medical evidence for competent medical opinions.
2. An ALJ errs by failing to address a medical opinion or by implicitly discounting it without explanation; the ALJ's failure to address opinions from Dr. Angeles, Dr. Olivares, and Dr. Carstens was not harmless.
3. The ALJ must explain how the supportability and consistency factors were considered when evaluating medical opinions, and the ALJ erred by failing to do so for certain opinions.
4. The ALJ may not cherry-pick favorable medical evidence while ignoring contrary evidence when determining a claimant's RFC.
5. Although the ALJ's failure to identify small fiber neuropathy as severe at step two was harmless because the claim proceeded beyond step two, the ALJ committed harmful error by failing to consider the impairment at later steps, including whether it met or equaled Listing 11.14.
6. The ALJ's errors were not harmless because the court could not meaningfully determine whether the conclusions were supported by substantial evidence without speculating or substituting its own findings.
7. The appropriate remedy was reversal and remand for further administrative proceedings, not an immediate award of benefits.

KEY QUOTATIONS

“By assigning no weight to any of the medical opinions concerning S.M.’s physical impairments, the ALJ effectively—and impermissibly—substituted his own interpretation of the medical evidence in place of the medical opinions when determining S.M.’s physical RFC.” (Discussion § III.A.1)

“The ALJ’s failure to address the SFN was harmful error.” (Discussion § III.B)

“For the reasons above, the Court REVERSES the ALJ’s decision and REMANDS the matter for further consideration and proceedings.” (Conclusion)

FACTUAL BACKGROUND

S.M. alleged disability beginning September 7, 2018, based in part on small fiber neuropathy, migraine headaches, spinal impairments, and mental impairments. The ALJ found severe lumbar degenerative disc disease, anxiety, obesity, and depressive disorders, but treated migraines as nonsevere and did not address small fiber neuropathy at step two or whether it met or equaled Listing 11.14 at step three. In determining the residual functional capacity, the ALJ rejected or failed to address multiple medical opinions and relied on selected later medical findings, including a 2023 MRI and records containing normal examinations, while not adequately considering contrary evidence.

PROCEDURAL HISTORY

S.M. originally sought Title XVI benefits for a period beginning October 1, 2014. After an initial denial, reconsideration, a 2021 unfavorable ALJ decision, a stipulated reversal and remand by the Eastern District of California, and an Appeals Council remand, S.M. amended the alleged onset date to September 7, 2018. Following a second hearing, the ALJ again denied benefits on June 20, 2024. The Northern District of California reversed and remanded for further proceedings.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The ALJ must reevaluate the medical opinions and medical evidence under the appropriate standards, consider S.M.’s small fiber neuropathy at the later stages of the sequential evaluation including Listing 11.14, reevaluate all steps of the five-step process concerning physical and mental impairments, and determine whether S.M. was disabled for any qualifying period since the alleged onset date.

CASES CITED

- Burch v. Barnhart, 400 F.3d 676, 679 (9th Cir. 2005)
- Bayliss v. Barnhart, 427 F.3d 1211, 1214 n.1 (9th Cir. 2005)
- Treichler v. Commissioner of Social Security Administration, 775 F.3d 1090, 1099 (9th Cir. 2014)
- Brown-Hunter v. Colvin, 806 F.3d 487, 492, 494 (9th Cir. 2015)
- Stout v. Commissioner, Social Security Administration, 454 F.3d 1050, 1054 (9th Cir. 2006)
- Andrews v. Shalala, 53 F.3d 1035, 1039–40 (9th Cir. 1995)
- Woods v. Kijakazi, 32 F.4th 785, 791–92 (9th Cir. 2022)
- Ounkham v. Commissioner of Social Security, No. 20-cv-01371-EPG, 2022 WL 705818, at *3 (E.D. Cal. Mar. 9, 2022)
- Tackett v. Apfel, 180 F.3d 1094, 1102–03 (9th Cir. 1999)

- Banks v. Barnhart, 434 F. Supp. 2d 800, 805 (C.D. Cal. 2006)
- Corvelo v. Kijakazi, No. 20-cv-01059-WHA, 2022 WL 1189885, at *5 (N.D. Cal. Apr. 21, 2022)
- Esparza v. O'Malley, No. 23-cv-1676, 2024 WL 1676280, at *6, *8
- Chavez v. Saul, No. 18-cv-1079-EFB, 2019 WL 4747698, at *4 (E.D. Cal. Sept. 30, 2019)
- Jones v. Colvin, No. 12-cv-999-PJW, 2013 WL 5492516, at *3 (C.D. Cal. Oct. 1, 2013)
- Garrison v. Colvin, 759 F.3d 995, 1010, 1012–13, 1019–20 (9th Cir. 2014)
- Brian T. v. Saul, No. 18-cv-02271-MAA, 2020 WL 470387, at *3 (C.D. Cal. Jan. 28, 2020)
- Hurn v. Saul, 798 F. App'x 976, 978 (9th Cir. 2019)
- Ford v. Saul, 950 F.3d 1141, 1156 (9th Cir. 2020)
- Connett v. Barnhart, 340 F.3d 871, 874 (9th Cir. 2003)
- Diedrich v. Berryhill, 874 F.3d 634, 641 (9th Cir. 2017)
- Kelly v. Berryhill, 732 F. App'x 558, 560–62 (9th Cir. 2018)
- Buck v. Berryhill, 869 F.3d 1040, 1048–49 (9th Cir. 2017)
- Young v. Sullivan, 911 F.2d 180, 184 (9th Cir. 1990)
- Marsh v. Colvin, 792 F.3d 1170, 1173 (9th Cir. 2015)
- Leon v. Berryhill, 880 F.3d 1041, 1045–46 (9th Cir. 2018)
- Luna v. Astrue, 623 F.3d 1032, 1035 (9th Cir. 2010)
- Barnhart v. Walton, 535 U.S. 212, 214 (2002)

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