

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NEW YORK

Elizabeth J. Z. v. Commissioner of Social Security

Elizabeth J. Z. · No. 24-CV-0666-MAV · Decided March 31, 2026

SUMMARY

The United States District Court for the Western District of New York reviewed the denial of Elizabeth J. Z.'s application for Disability Insurance Benefits. The court held that the Administrative Law Judge inadequately evaluated Plaintiff's subjective symptoms under the applicable Social Security regulations and rulings. The court granted Plaintiff's motion for judgment on the pleadings, denied the Commissioner's cross-motion, and remanded the matter for further administrative proceedings under sentence four of 42 U.S.C. § 405(g).

CASE DETAILS

COURT	United States District Court for the Western District of New York
JURISDICTION	United States District Court for the Western District of New York
DECIDED	March 31, 2026
DOCKET	24-CV-0666-MAV
DISPOSITION	remanded
PROCEDURAL POSTURE	Plaintiff sought review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying Disability Insurance Benefits. The parties filed cross-motions for judgment on the pleadings under Federal Rule of Civil Procedure 12(c).
STANDARD OF REVIEW	The court reviews whether the Commissioner applied the correct legal standards and whether the decision is supported by substantial evidence. Legal principles are reviewed de novo; factual findings are upheld unless a reasonable factfinder would have to conclude otherwise.
PRECEDENTIAL VALUE	Unknown; district court decision with no reported citation
PARTIES	Elizabeth J. Z. v. Commissioner of Social Security

TOPICS

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

PRACTICE AREAS

Social Security disability benefits

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ adequately evaluated Plaintiff's subjective statements concerning the intensity, persistence, and limiting effects of her symptoms under 20 C.F.R. § 404.1529 and the applicable Social Security rulings.
2. Whether the ALJ's residual functional capacity determination was supported by substantial evidence and proper legal standards.
3. Whether the ALJ materially mischaracterized the medical evidence.

HOLDINGS

1. The ALJ's evaluation of Plaintiff's subjective symptoms was legally insufficient because the decision used boilerplate language, did not adequately reconcile the objective medical evidence with Plaintiff's reported symptoms, and did not analyze the required regulatory factors concerning other evidence in the record.
2. Remand under sentence four of 42 U.S.C. § 405(g) was required for further administrative proceedings consistent with the decision.

KEY QUOTATIONS

"The determination or decision must contain specific reasons for the weight given to the individual's symptoms, be consistent with and supported by the evidence, and be clearly articulated so the individual and any subsequent reviewer can assess how the adjudicator evaluated the individual's symptoms." (at 8-9)

"Even if the ALJ had sufficiently demonstrated a reconciliation of the objective medical evidence with respect to Plaintiff's symptoms, the ALJ was still then obligated to analyze "other evidence" in the record before finding Plaintiff's subjective reports of her symptoms not to be credible." (at 10)

FACTUAL BACKGROUND

Plaintiff alleged disability based on a low back injury, fibromyalgia, arthritis, a left hip tear, cervical spine impairments, and right shoulder impairments. She testified that pain required her to lie down for two to three hours during an eight-hour workday and limited her ability to sit, stand, walk, lift, cook, shop, and perform laundry. The ALJ found several severe physical impairments and determined that Plaintiff retained the capacity for a restricted range of sedentary work, including work with positional changes and specified postural and manipulative limitations.

PROCEDURAL HISTORY

Plaintiff applied for Disability Insurance Benefits in December 2020. The Social Security Administration denied the claim initially and on reconsideration. After a June 2023 hearing, the ALJ found Plaintiff not disabled at step five because she could perform jobs existing in significant numbers in the national economy. The Appeals

Council denied review on May 14, 2024, making the ALJ's decision final. The district court granted Plaintiff's motion for judgment on the pleadings and remanded under sentence four of 42 U.S.C. § 405(g) for further administrative proceedings.

DISPOSITION

remanded

REMAND INSTRUCTIONS

The matter is remanded under sentence four of 42 U.S.C. § 405(g) for further administrative proceedings consistent with the decision. The Appeals Council is directed to assess whether additional, consistent instructions are warranted in the remand order. The court did not reach Plaintiff's remaining arguments.

CASES CITED

- McIntyre v. Colvin, 758 F.3d 146, 150 (2d Cir. 2014)
- Melville v. Apfel, 198 F.3d 45, 51 (2d Cir. 1999)
- Poupore v. Astrue, 566 F.3d 308, 306 (2d Cir. 2009)
- Nedzad O. v. Commissioner of Social Security, 577 F. Supp. 3d 37, 44 (N.D.N.Y. 2021)
- Perez v. Chater, 77 F.3d 41, 44 (2d Cir. 1996)
- Rucker v. Kijakazi, 48 F.4th 86, 90-91 (2d Cir. 2022)
- Douglass v. Astrue, 496 F. App'x 154, 156 (2d Cir. 2012)
- Kohler v. Astrue, 546 F.3d 260, 265 (2d Cir. 2008)
- Johnson v. Bowen, 817 F.2d 988, 986 (2d Cir. 1987)
- Schillo v. Kijakazi, 31 F.4th 64, 74 (2d Cir. 2022)
- Biestek v. Berryhill, 587 U.S. 97, 103 (2019)
- Williams v. Berryhill, No. 17-CV-1660 (JMA), 2019 WL 1271647, at *5 (E.D.N.Y. Mar. 19, 2019)
- Acevedo v. Saul, 577 F. Supp. 3d 237, 246 (S.D.N.Y. 2021)
- Campbell v. Astrue, 465 F. App'x 4, 7 (2d Cir. 2012)
- Valet v. Astrue, No. 10-CV-3282 KAM, 2012 WL 194970, at *22 (E.D.N.Y. Jan. 23, 2012)
- Cabibi v. Colvin, 50 F. Supp. 3d 218, 237 (E.D.N.Y. 2014)
- Kane v. Astrue, 942 F. Supp. 2d 301, 314 (E.D.N.Y. 2013)
- Pereyra v. Astrue, No. 10-CV-5873 (DLI), 2012 WL 3746200, at *15 (E.D.N.Y. Aug. 28, 2012)
- Smith v. O'Malley, No. 23-CV-02339 (JLC), 2024 WL 1983881, at *13 (S.D.N.Y. May 6, 2024)
- Carlin v. Commissioner of Social Security, No. 19-CV-6312-LJV, 2020 WL 5995181, at *3 (W.D.N.Y. Oct. 9, 2020)