

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
TEXAS, GALVESTON DIVISION

L.Y. v. Commissioner of Social Security

L.Y. · No. 3:26-cv-00112 · Decided April 16, 2026

SUMMARY

The United States District Court for the Southern District of Texas reviews L.Y.’s challenge to the denial of disability insurance benefits under Title II of the Social Security Act. The court holds that substantial evidence supports the Administrative Law Judge’s determination that L.Y. did not satisfy Listing 1.15, including the requirement of a medically documented need for an assistive device for a continuous period of at least 12 months, and affirms the Commissioner’s decision.

CASE DETAILS

COURT	United States District Court for the Southern District of Texas, Galveston Division
WRITING FOR THE COURT	Andrew M. Edison
JURISDICTION	United States District Court for the Southern District of Texas, Galveston Division
DECIDED	April 16, 2026
DOCKET	3:26-cv-00112
DISPOSITION	affirmed
PROCEDURAL POSTURE	Action for judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying Title II disability and disability insurance benefits.
STANDARD OF REVIEW	The court reviewed whether the Commissioner applied the proper legal standards and whether the decision was supported by substantial evidence on the record as a whole. The court could not reweigh the evidence and was limited to the reasons stated in the ALJ's decision, without considering post hoc rationalizations.
PRECEDENTIAL VALUE	Unknown
PARTIES	L.Y. v. Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

ada / disability

disability definition

PRACTICE AREAS

Social Security

administrative law

disability benefits

QUESTIONS PRESENTED

1. Whether substantial evidence supported the ALJ's Step 3 determination that L.Y.'s impairments did not meet or medically equal Listing 1.15.
2. Whether the record established the Listing 1.15, subpart D requirement of a medically necessary assistive device for a continuous period of at least twelve months.

HOLDINGS

1. The ALJ's determination that L.Y.'s impairments did not meet or medically equal Listing 1.15 was supported by substantial evidence.

KEY QUOTATIONS

“Substantial evidence is that which is relevant and sufficient for a reasonable mind to accept as adequate to support a conclusion; it must be more than a scintilla, but it need not be a preponderance. It is the role of the Commissioner, and not the courts, to resolve conflicts in the evidence. As a result, [a] court cannot reweigh the evidence, but may only scrutinize the record to determine whether it contains substantial evidence to support the Commissioner’s decision.” (at 2)

FACTUAL BACKGROUND

L.Y. alleged disability beginning June 9, 2021, based in part on degenerative disc disease and mental and other physical impairments. The ALJ found severe impairments but determined that they did not meet or medically equal a listed impairment, assessed an RFC for a limited range of light work, and found that L.Y. could perform past relevant work. L.Y. argued that references to her use of a walker established the medical-necessity and duration requirements of Listing 1.15, subpart D. The district court concluded that the cited records reflected statements or observations of walker use and did not establish a medically necessary walker for a continuous twelve-month period.

PROCEDURAL HISTORY

L.Y. applied for disability and disability insurance benefits, was denied initially and on reconsideration, and received a hearing before an administrative law judge. The ALJ found that she was not disabled, and the Appeals Council denied review, making the ALJ's decision final. The district court reviewed the administrative record and briefing and affirmed the Commissioner's decision.

DISPOSITION

affirmed

CASES CITED

- Waters v. Barnhart, 276 F.3d 716, 718 (5th Cir. 2002)
- Estate of Morris v. Shalala, 207 F.3d 744, 745 (5th Cir. 2000)
- Ramirez v. Colvin, 606 F. App'x 775, 777 (5th Cir. 2015)
- SEC v. Chenery Corp., 332 U.S. 194, 196 (1947)
- Anthony v. Sullivan, 954 F.2d 289, 293 (5th Cir. 1992)
- Salmond v. Berryhill, 892 F.3d 812, 817 (5th Cir. 2018)
- Kneeland v. Berryhill, 850 F.3d 749, 753-54 (5th Cir. 2017)
- Jones v. O'Malley, 107 F.4th 489, 493, 498 (5th Cir. 2024)
- Breode V. v. Commissioner, Social Security Administration, No. 3:25-cv-254, 2026 WL 673837, at *5 (N.D. Tex. Mar. 6, 2026)

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