

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MICHIGAN, SOUTHERN DIVISION

Bryan F. v. Commissioner of Social Security

Bryan F. · No. 2:25-cv-10223 · Decided December 2, 2025

SUMMARY

The United States District Court for the Eastern District of Michigan reviewed a denial of supplemental security income under 42 U.S.C. § 405(g). The court held that the Administrative Law Judge adequately evaluated the opinions of consultative examiners and properly assessed the claimant’s residual functional capacity, denied the claimant’s motion for summary judgment, granted the Commissioner’s motion, and affirmed the decision.

CASE DETAILS

COURT	United States District Court for the Eastern District of Michigan, Southern Division
WRITING FOR THE COURT	Elizabeth A. Stafford
JURISDICTION	United States District Court for the Eastern District of Michigan, Southern Division
DECIDED	December 2, 2025
DOCKET	2:25-cv-10223
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying his application for supplemental security income. The parties consented to magistrate-judge jurisdiction and filed cross-motions for summary judgment.
STANDARD OF REVIEW	The court reviews the Commissioner's decision under 42 U.S.C. § 405(g) to determine whether it is supported by substantial evidence and conforms to proper legal standards. The court may not independently weigh the evidence or substitute its judgment for the Commissioner's when substantial evidence supports the decision.
PRECEDENTIAL VALUE	Unknown
PARTIES	Bryan F. v. Commissioner of Social Security

TOPICS

judicial review of agency action

summary judgment

administrative law

civil procedure

PRACTICE AREAS

Social Security disability benefits

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ adequately evaluated the supportability and consistency of the opinions of consultative examiners Hugh Bray and John Jeter.
2. Whether the ALJ's residual functional capacity adequately accounted for the mental limitations identified by Bray and Jeter.
3. Whether the Commissioner's decision was supported by substantial evidence and applied the proper legal standards.

HOLDINGS

1. The ALJ did not err in evaluating Bray's and Jeter's opinions because she accurately summarized their findings, found the opinions generally persuasive, considered their supportability and consistency, and explained how the opinions and other record evidence informed the residual functional capacity.
2. The ALJ was not required to adopt every finding in Bray's and Jeter's otherwise persuasive opinions, including implied limitations concerning excessive absences or off-task behavior, because the ALJ explained the basis for the residual functional capacity and no medical source imposed concrete limitations requiring those restrictions.
3. The Commissioner's decision was supported by substantial evidence and conformed to proper legal standards; plaintiff failed to show that the RFC inadequately addressed his mental impairments.

KEY QUOTATIONS

“Under § 405(g), this Court’s review is limited to determining whether the Commissioner’s decision is supported by substantial evidence and conformed with proper legal standards.” (PageID.237)

“The substantial-evidence standard does not permit the Court to independently weigh the evidence.” (PageID.237)

FACTUAL BACKGROUND

Plaintiff applied for supplemental security income and alleged mental impairments affecting his ability to work. Consultative examiners Hugh Bray and John Jeter opined that his ability to withstand the pressures of full-time employment was markedly impaired and that his ability to maintain workplace pace and schedule was severely impaired, while also finding that he could understand and perform simple tasks and was moderately impaired in concentration, persistence, and pace. The ALJ found the opinions generally persuasive, incorporated restrictions into the residual functional capacity limiting plaintiff to simple, routine, repetitive work at less than a production-rate pace with limited interactions and few gradual workplace changes, and relied on other medical evidence and state-agency opinions.

PROCEDURAL HISTORY

The Administrative Law Judge denied plaintiff's application for supplemental security income. Plaintiff appealed the Commissioner's final decision to the Eastern District of Michigan, arguing that the ALJ inadequately evaluated the opinions of consultative examiners Hugh Bray, Ph.D., and John Jeter, M.A., and adopted an insufficient residual functional capacity. The court denied plaintiff's motion for summary judgment, granted the Commissioner's motion, and affirmed the ALJ's decision under sentence four of 42 U.S.C. § 405(g).

DISPOSITION

affirmed

CASES CITED

- Gentry v. Commissioner of Social Security, 741 F.3d 708, 722 (6th Cir. 2014)
- Biestek v. Berryhill, 587 U.S. 97, 102-03 (2019)
- Hatmaker v. Commissioner of Social Security, 965 F. Supp. 2d 917, 930 (E.D. Tenn. 2013)
- Cutlip v. Secretary of Health & Human Services, 25 F.3d 284, 286 (6th Cir. 1994)
- Bass v. McMahon, 499 F.3d 506, 513 (6th Cir. 2007)
- Hardy v. Commissioner of Social Security, 554 F. Supp. 3d 900, 905 (E.D. Mich. 2021)
- Smith-Johnson v. Commissioner of Social Security, 579 F. App'x 426, 437 (6th Cir. 2014)
- Mirian S. v. Commissioner of Social Security, No. 4:23-cv-12979, 2024 WL 5439688, at *15 (E.D. Mich. Oct. 8, 2024)
- Corliss K. v. Bisignano, No. 24-cv-03707, 2025 WL 2691884 (D. Minn. Sept. 22, 2025)
- Burmester v. Berryhill, 920 F.3d 507, 511 (7th Cir. 2019)
- McCoy v. Kijakazi, No. 21-11739, 2023 WL 3407159, at *7 (E.D. Mich. Feb. 27, 2023), adopted, 2023 WL 3147899 (E.D. Mich. Apr. 28, 2023)
- Simpkins v. Commissioner of Social Security, No. 20-10673, 2021 WL 4198404, at *3 (E.D. Mich. Apr. 8, 2021), adopted, 2021 WL 3771874 (E.D. Mich. Aug. 25, 2021)