

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
WASHINGTON

James K. v. Commissioner of Social Security

James K. · No. 1:25-CV-3091-TOR · Decided February 11, 2026

SUMMARY

The U.S. District Court for the Eastern District of Washington grants Plaintiff James K.’s opening brief and denies the Commissioner of Social Security’s brief in a judicial review of a disability-benefits decision. The court upholds the administrative law judge’s finding that drug addiction and alcoholism were material to disability, but remands for further consideration of the supportability and consistency factors relating to certain medical opinions.

CASE DETAILS

COURT	United States District Court for the Eastern District of Washington
JURISDICTION	U.S. District Court for the Eastern District of Washington
DECIDED	February 11, 2026
DOCKET	1:25-CV-3091-TOR
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying disability insurance benefits and supplemental security income. The court granted Plaintiff's opening brief, denied the Commissioner's brief, reversed the administrative decision, and remanded for further proceedings under sentence four of § 405(g).
STANDARD OF REVIEW	Under 42 U.S.C. § 405(g), the Commissioner's decision may be disturbed only if it is unsupported by substantial evidence or based on legal error. Substantial evidence is relevant evidence that a reasonable mind might accept as adequate to support a conclusion, and the court must consider the record as a whole. The court may not substitute its judgment for the Commissioner's, and harmless errors do not warrant reversal.
PRECEDENTIAL VALUE	unpublished
PARTIES	James K. v. Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

disability definition

ada / disability

PRACTICE AREAS

Social Security disability

administrative law

disability benefits

QUESTIONS PRESENTED

1. Whether the ALJ properly found that Plaintiff's drug addiction and alcoholism were material to the disability determination.
2. Whether the ALJ properly evaluated the medical opinion evidence from Dr. Genthe, Dr. Anderson, and Dr. Garner.
3. Whether the ALJ properly evaluated Plaintiff's subjective symptom testimony concerning his mental impairments.
4. Whether the ALJ properly considered the Paragraph C criteria of Listings 12.04, 12.06, 12.11, and 12.15.

HOLDINGS

1. The ALJ's finding that Plaintiff's drug addiction and alcoholism were material to the disability determination was supported by substantial evidence.
2. The ALJ erred by failing to address the required supportability and consistency factors for Dr. Anderson's opinion and by failing to address supportability for Dr. Garner's opinion.
3. The ALJ reversibly erred by failing to identify specifically which portions of Plaintiff's mental symptom testimony were rejected and what evidence undermined those portions.
4. The ALJ did not err in finding that Plaintiff failed to satisfy the Paragraph C criteria of the applicable mental-disorder listings.

KEY QUOTATIONS

"The ALJ failed to identify with specificity what testimony was not credible and what evidence undermined Plaintiff's subjective complaints." (Discussion § C)

"The Court reverses and remands this case back to the Commissioner to reweigh both the medical opinions of Dr. Anderson and Dr. Garner and Plaintiff's subjective symptom testimony." (Conclusion)

FACTUAL BACKGROUND

Plaintiff alleged disability based principally on cervical and shoulder conditions and several mental impairments, including depressive, trauma-related, anxiety, and attention-deficit disorders, together with substance-use disorders. The ALJ found that Plaintiff was disabled when substance use was included but that drug addiction and alcoholism were material because Plaintiff functioned substantially better during established periods of sobriety. The ALJ therefore found Plaintiff not disabled and determined that he could perform light work with

postural, environmental, and mental restrictions, including jobs existing in significant numbers in the national economy.

PROCEDURAL HISTORY

Plaintiff applied for Title II and Title XVI benefits, and the applications were denied initially and on reconsideration. An ALJ denied the claims in 2022; the Appeals Council remanded, after which the ALJ again denied benefits on August 3, 2024. The Appeals Council denied review on April 24, 2025, making the ALJ's decision final. The district court reversed and remanded because the ALJ failed to properly explain the evaluation of certain medical opinions and failed to identify specifically the testimony and evidence supporting rejection of Plaintiff's mental symptom testimony.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Commissioner must conduct further proceedings consistent with the order, including reweighing the medical opinions of Dr. Anderson and Dr. Garner and reevaluating Plaintiff's mental symptom testimony with specific findings identifying the testimony discounted and the evidence supporting those findings.

CASES CITED

- Hill v. Astrue, 698 F.3d 1153, 1158-59 (9th Cir. 2012)
- Edlund v. Massanari, 253 F.3d 1152, 1156 (9th Cir. 2001)
- Molina v. Astrue, 674 F.3d 1104, 1111, 1115 (9th Cir. 2012)
- Shinseki v. Sanders, 556 U.S. 396, 409-10 (2009)
- Tackett v. Apfel, 180 F.3d 1094, 1098 (9th Cir. 1999)
- Beltran v. Astrue, 700 F.3d 386, 389 (9th Cir. 2012)
- Orteza v. Shalala, 50 F.3d 748, 749 (9th Cir. 1995)
- Gatliff v. Commissioner of the Social Security Administration, 172 F.3d 690, 694 (9th Cir. 1999)
- Woods v. Kijakazi, 32 F.4th 785, 787 (9th Cir. 2022)
- Molina v. Astrue, 674 F.3d 1104, 1112 (9th Cir. 2012)
- Vasquez v. Astrue, 572 F.3d 586, 591 (9th Cir. 2009)
- Lingenfelter v. Astrue, 504 F.3d 1028, 1035-36 (9th Cir. 2007)
- Ghanim v. Colvin, 763 F.3d 1154, 1163 (9th Cir. 2014)
- Lester v. Chater, 81 F.3d 821, 834 (9th Cir. 1995)
- Thomas v. Barnhart, 278 F.3d 947, 958 (9th Cir. 2002)
- Garrison v. Colvin, 759 F.3d 995, 1015 (9th Cir. 2014)
- Moore v. Commissioner of Social Security Administration, 278 F.3d 920, 924 (9th Cir. 2002)
- Brown-Hunter v. Colvin, 806 F.3d 487 (9th Cir. 2015)

- Bray v. Commissioner of Social Security Administration, 554 F.3d 1219, 1225 (9th Cir. 2009)
- Burch v. Barnhart, 400 F.3d 676, 679 (9th Cir. 2005)
- Gonzalez v. Sullivan, 914 F.2d 1197, 1201 (9th Cir. 1990)
- Lewin v. Schweiker, 654 F.2d 631, 635 (9th Cir. 1981)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/federal/united-states-district-court-for-the-eastern-district-of-was/2026/james-k-v-commissioner-of-social-security-6j4fnqrb>