

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF OHIO, EASTERN DIVISION

Kari A. Grohl v. Commissioner of Social Security Administration

Grohl · No. 5:25-cv-279 · Decided March 6, 2026

SUMMARY

The United States District Court for the Northern District of Ohio affirmed the Commissioner of Social Security’s denial of Kari A. Grohl’s applications for Disability Insurance Benefits and Supplemental Security Income. The court overruled Grohl’s objection to the magistrate judge’s Report and Recommendation, holding that substantial evidence supported the Administrative Law Judge’s residual functional capacity determination, including the decision not to require use of a cane or walker. The case was dismissed with prejudice.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio, Eastern Division
WRITING FOR THE COURT	Sara Lioi
JURISDICTION	United States District Court for the Northern District of Ohio, Eastern Division
DECIDED	March 6, 2026
DOCKET	5:25-cv-279
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's denial of Disability Insurance Benefits and Supplemental Security Income. After a magistrate judge recommended affirmance, plaintiff objected, and the district court conducted de novo review of the objection.
STANDARD OF REVIEW	The district court reviews the magistrate judge's recommendation de novo as to properly made objections under 28 U.S.C. § 636(b) and Fed. R. Civ. P. 72(b)(3). Review of the Commissioner's decision is limited to whether the ALJ applied the correct legal standards and whether the decision is supported by substantial evidence in the record as a whole. The court may not resolve evidentiary conflicts or decide credibility and must ensure that the ALJ followed applicable

	regulations and built an accurate and logical bridge between the evidence and the result.
PRECEDENTIAL VALUE	Nonprecedential district court memorandum opinion; precedential status is not stated in the opinion.
PARTIES	Kari A. Grohl v. Commissioner of Social Security Administration

TOPICS

judicial review of agency action administrative law civil procedure

PRACTICE AREAS

Social Security law administrative law federal civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ's decision was supported by substantial evidence despite not including use of a cane or walker in Grohl's residual functional capacity.
2. Whether Dr. Mahdi's medical documentation established under Social Security Ruling 96-9p that a hand-held assistive device was medically required and described the circumstances in which it was needed.
3. Whether the magistrate judge's Report and Recommendation should be accepted and the Commissioner's denial of benefits affirmed.

HOLDINGS

1. Medical documentation must establish the need for a hand-held assistive device to aid walking or standing and describe the circumstances in which it is needed. Dr. Mahdi's references to a cane, a walker for activities of daily living and shopping, improved quality of life, and fall prevention did not provide the required specificity.
2. The ALJ did not err by failing to include use of a cane or walker in Grohl's RFC because the medical evidence did not establish that either device was medically necessary under SSR 96-9p.
3. The Commissioner's decision denying DIB and SSI was supported by substantial evidence and was affirmed.

KEY QUOTATIONS

“Dr. Mahdi’s observations regarding possible benefits from the use of a cane or walker do not explain the circumstances under which she believed a hand-held assistive device was medically necessary.” (8)

“Because the Commissioner’s decision to deny DIB and SSI is supported by substantial evidence, the decision is affirmed and this case is dismissed with prejudice.” (10)

FACTUAL BACKGROUND

Grohl applied for DIB and SSI, alleging disability beginning April 30, 2016. The ALJ found severe impairments including obesity, fibromyalgia, cervical degenerative disc disease, hypertension, sleep apnea, right-knee and right-shoulder osteoarthritis, depressive disorder, and post-traumatic stress disorder, but determined that she retained the residual functional capacity for a range of sedentary work and could perform jobs existing in significant numbers in the national economy. Grohl's objection focused on the ALJ's failure to include use of a cane or walker in the RFC based primarily on a May 2023 note from Dr. Alaa Mahdi.

PROCEDURAL HISTORY

Grohl's application for DIB and SSI was denied initially and on reconsideration. An ALJ denied the application in 2022, the matter was previously remanded for further administrative proceedings, and a second ALJ decision dated December 6, 2024 again found Grohl not disabled. The magistrate judge recommended affirming the Commissioner's decision. The district court overruled Grohl's objection, accepted the Report and Recommendation, affirmed the Commissioner's decision, and dismissed the case with prejudice.

DISPOSITION

affirmed

CASES CITED

- Aldrich v. Bock, 327 F. Supp. 2d 743, 747 (E.D. Mich. 2004)
- Kyle v. Commissioner of Social Security, 609 F.3d 847, 854-55 (6th Cir. 2010)
- Gentry v. Commissioner of Social Security, 741 F.3d 708, 722 (6th Cir. 2014)
- Rogers v. Commissioner of Social Security, 486 F.3d 234, 241 (6th Cir. 2007)
- DeLong v. Commissioner of Social Security Administration, 748 F.3d 723, 726 (6th Cir. 2014)
- Bass v. McMahon, 499 F.3d 506, 509 (6th Cir. 2007)
- Lindsley v. Commissioner of Social Security, 560 F.3d 601, 604-05 (6th Cir. 2009)
- McClanahan v. Commissioner of Social Security, 474 F.3d 830, 833 (6th Cir. 2006)
- Buxton v. Halter, 246 F.3d 762, 772 (6th Cir. 2001)
- Rabbers v. Commissioner of Social Security Administration, 582 F.3d 647, 651 (6th Cir. 2009)
- Bowen v. Commissioner of Social Security, 478 F.3d 742, 746 (6th Cir. 2007)
- Fleischer v. Astrue, 774 F. Supp. 2d 875, 877 (N.D. Ohio 2011)
- Sarchet v. Chater, 78 F.3d 305, 307 (7th Cir. 1996)
- Wilson v. Commissioner of Social Security, 378 F.3d 541, 544-46 (6th Cir. 2004)
- Carreon v. Massanari, 51 F. App'x 571, 575 (6th Cir. 2002)
- Casey v. Secretary of Health Services, 987 F.2d 1230, 1235 (6th Cir. 1993)
- Tripp v. Astrue, 489 F. App'x 951, 955 (7th Cir. 2012)
- Duty v. Commissioner of Social Security Administration, No. 5:20-cv-2647, 2022 WL 1462008, at *16 (N.D. Ohio Mar. 21, 2022)

- Thacker v. Commissioner of Social Security, No. 3:21-cv-1617, 2022 WL 3369533, at *3 (N.D. Ohio Aug. 16, 2022)
- Wright v. Saul, No. 1:18-cv-1724, 2019 WL 3729264, at *3 (N.D. Ohio 2019)
- Peters v. Commissioner of Social Security Administration, No. 1:24-cv-26, 2024 WL 4945007, at *9-10 (N.D. Ohio Dec. 3, 2024)

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