

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

Lucas Lawton v. Commissioner of Social Security Administration

No. 1:25-CV-00720-CEH (N.D. Ohio Nov. 21, 2025) · No. 1:25-CV-00720-CEH · Decided November 21, 2025

SUMMARY

The United States District Court for the Northern District of Ohio reviewed the Commissioner of Social Security’s denial of Lucas Lawton’s application for Disability Insurance Benefits. The court held that the administrative law judge failed to adequately explain the evidence supporting the residual functional capacity assessment, particularly regarding Lawton’s upper-extremity limitations and symptom allegations. The court reversed the nondisability finding and remanded the case under Sentence Four of 42 U.S.C. § 405(g); it did not reach the separate hypersomnia argument.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio, Eastern Division
WRITING FOR THE COURT	Carmen E. Henderson
JURISDICTION	United States District Court for the Northern District of Ohio, Eastern Division
DECIDED	November 21, 2025
DOCKET	1:25-CV-00720-CEH
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Lawton sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying his application for Disability Insurance Benefits. The parties consented to disposition by a United States magistrate judge under 28 U.S.C. § 636(c) and Federal Rule of Civil Procedure 73.
STANDARD OF REVIEW	The court reviewed whether the Commissioner's decision was supported by substantial evidence and made pursuant to proper legal standards. It also required the ALJ to explain the evidentiary basis for the residual functional capacity assessment and to build an accurate and logical bridge between the evidence and the result.
PRECEDENTIAL VALUE	unpublished district court opinion; precedential status unknown

PARTIES

Lucas Lawton v. Commissioner of Social Security Administration

TOPICS

judicial review of agency action

administrative law

civil procedure

remedies

PRACTICE AREAS

Social Security disability

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ adequately evaluated Lawton's upper-extremity limitations and sufficiently explained the residual functional capacity assessment under the substantial-evidence standard.
2. Whether the ALJ erred by failing to evaluate or impose work-related restrictions for Lawton's idiopathic hypersomnia and excessive daytime sleepiness.

HOLDINGS

1. The ALJ's RFC determination was not adequately supported because the decision used boilerplate language to discount Lawton's symptom allegations and failed to explain why the evidence supported the specific upper-extremity limitations included in the RFC.
2. The court did not decide whether the ALJ improperly failed to evaluate or impose work-related restrictions for idiopathic hypersomnia and excessive daytime sleepiness because the inadequate RFC analysis independently required remand.

KEY QUOTATIONS

"A court "cannot uphold an ALJ's decision, even if there is 'enough evidence in the record to support the decision, [where] the reasons given by the trier of fact do not build an accurate and logical bridge between the evidence and the result.'"" (Section V.C.1)

"Thus, the mere presence of these normal findings in the record—without any indication that the ALJ relied on them in reaching his decision—is insufficient to uphold the decision." (Section V.C.1)

FACTUAL BACKGROUND

Lawton alleged disability based primarily on upper-extremity problems, including arthritis, carpal tunnel syndrome, shoulder and elbow conditions, hand cramping, and limitations in reaching, typing, and handling objects. He underwent multiple upper-extremity procedures in 2023, including left shoulder and carpal tunnel surgery, right carpal tunnel and trigger-finger releases, and manipulation of the left elbow under anesthesia. He also reported obstructive sleep apnea, idiopathic hypersomnia, and excessive daytime sleepiness. The ALJ found that Lawton could perform sedentary work with several restrictions, including frequent reaching, handling, fingering, and feeling with both upper extremities, but did not adequately explain why those particular limitations were supported or why Lawton's symptom allegations were discounted.

PROCEDURAL HISTORY

Lawton applied for Disability Insurance Benefits on June 1, 2023, alleging disability beginning May 31, 2023. The application was denied initially and on reconsideration; after an April 18, 2024 hearing, the ALJ issued a nondisability decision on May 1, 2024. The Appeals Council denied review on February 10, 2025, making the ALJ's decision final. Lawton filed this action on April 10, 2025. The district court reversed the nondisability finding and remanded under sentence four of 42 U.S.C. § 405(g).

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Commissioner and ALJ must reconsider the disability claim under the applicable regulations, including all relevant evidence concerning Lawton's upper-extremity limitations, symptom allegations, residual functional capacity, idiopathic hypersomnia, and excessive daytime sleepiness. The remand was ordered under sentence four of 42 U.S.C. § 405(g).

CASES CITED

- Winn v. Commissioner of Social Security, 615 F. App'x 315, 320 (6th Cir. 2015)
- Rogers v. Commissioner of Social Security, 486 F.3d 234, 241 (6th Cir. 2007)
- Cutlip v. Secretary of HHS, 25 F.3d 284, 286 (6th Cir. 1994)
- Olive v. Commissioner of Social Security, No. 3:06 CV 1597, 2007 WL 5403416, at *2 (N.D. Ohio Sept. 19, 2007)
- Abbott v. Sullivan, 905 F.2d 918, 922 (6th Cir. 1990)
- Mullen v. Bowen, 800 F.2d 535, 538 (6th Cir. 1986) (en banc)
- Kinsella v. Schweiker, 708 F.2d 1058, 1059-60 (6th Cir. 1983)
- Combs v. Commissioner of Social Security, 459 F.3d 640, 642-43 (6th Cir. 2006)
- Walters v. Commissioner of Social Security, 127 F.3d 525, 529 (6th Cir. 1997)
- Fleischer v. Astrue, 774 F. Supp. 2d 875, 877, 881 (N.D. Ohio 2011)
- Hicks v. Commissioner of Social Security, 909 F.3d 786, 808 (6th Cir. 2018)
- Russell v. Commissioner of Social Security Administration, No. 1:23-cv-01748-DAC, 2024 WL 3638702, at *19 (N.D. Ohio Aug. 2, 2024)
- Correa v. Commissioner of Social Security, No. 1:23-cv-685, 2023 WL 9064960, at *10 (N.D. Ohio Dec. 14, 2023)
- Cox v. Commissioner of Social Security, 615 F. App'x 254, 261 (6th Cir. 2015)