

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Matthew Wayne Christenson v. Commissioner of Social Security

Christenson · No. 2:24-CV-1704-DMC · Decided April 28, 2025

SUMMARY

The Eastern District of California reviewed a Social Security disability determination concerning the claimant's residual functional capacity and mental impairments. The court remanded under sentence four of 42 U.S.C. § 405(g) because the ALJ did not adequately explain why the claimant's limitation in interacting with others applied only to the public and not to supervisors and coworkers.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Dennis M. Cota
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	April 28, 2025
DOCKET	2:24-CV-1704-DMC
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 benefits for the period from January 1, 2007, through June 30, 2008. The parties filed cross-motions for summary judgment.
STANDARD OF REVIEW	The court reviews the Commissioner's final decision for proper legal standards and substantial evidence in the record as a whole. Substantial evidence is more than a mere scintilla but less than a preponderance; where evidence permits more than one rational interpretation and one supports the Commissioner's decision, the decision must be affirmed. The court may set the decision aside when an improper legal standard was applied or the findings lack substantial evidentiary support.
PRECEDENTIAL VALUE	Unknown; memorandum opinion and order from a federal district court
PARTIES	Matthew Wayne Christenson v. Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

summary judgment

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PRACTICE AREAS

Social Security disability

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ's residual functional capacity finding was supported by substantial evidence when the ALJ found a moderate limitation in interacting with others but limited only interaction with the public and did not address supervisors or coworkers.
2. Whether remand under sentence four of 42 U.S.C. § 405(g) was warranted for further development of the record and additional findings.

HOLDINGS

1. The ALJ failed to support the exclusion of limitations on interactions with supervisors and coworkers. Because the ALJ found that Christenson was limited in interacting with 'others' but did not explain why that limitation applied only to the public, the residual functional capacity finding was internally insufficient and required remand.
2. The matter was remanded under sentence four of 42 U.S.C. § 405(g) for further development of the record and further findings addressing why limitations on interaction with supervisors and coworkers were not included.

KEY QUOTATIONS

“The ALJ’s conclusion provides no insight as to why he simultaneously and inconsistently found Christensen moderately limited in his ability to interact with others but not limited whatsoever in his ability to interact with supervisors or coworkers.” (at 9)

“The ALJ, however, does not offer any explanation or citation to the record to indicate why limitations in interactions with “others” includes only interactions with the public and not supervisors and co-workers.” (at 10)

FACTUAL BACKGROUND

Christenson alleged disability beginning January 1, 2007, and had a date last insured of June 30, 2008. The ALJ found severe impairments including a left below-the-knee amputation, ventricular tachycardia, major depressive disorder, and generalized anxiety disorder, but determined that Christenson retained the capacity for sedentary work with restrictions, including occasional interaction with the public. The ALJ also found Christenson moderately limited in interacting with others but did not impose corresponding limitations concerning supervisors or coworkers. The district court concluded that the ALJ failed to explain why the limitation concerning interaction with others applied only to the public.

PROCEDURAL HISTORY

Christenson applied for Social Security benefits on May 8, 2018, alleging disability beginning January 1, 2007. After the application and reconsideration denials, an administrative hearing was held on December 20, 2022, followed by a supplemental hearing on May 23, 2023. The ALJ issued a decision in June 2024 finding Christenson not disabled through his date last insured of June 30, 2008, although disabled as of May 8, 2018. The Appeals Council declined review on November 22, 2023. The district court granted Christenson's motion for summary judgment, denied the Commissioner's motion, reversed the final decision, and remanded under sentence four of 42 U.S.C. § 405(g).

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Commissioner must conduct further proceedings, including further development of the record and/or findings explaining why a limitation concerning interaction with coworkers and the public, or other interaction limitations, was not included in light of the ALJ's finding that Christenson was limited in interacting with 'others.'

CASES CITED

- Tackett v. Apfel, 180 F.3d 1094, 1097 (9th Cir. 1999)
- Saelee v. Chater, 94 F.3d 520, 521 (9th Cir. 1996)
- Richardson v. Perales, 402 U.S. 389, 402 (1971)
- Howard v. Heckler, 782 F.2d 1484, 1487 (9th Cir. 1986)
- Jones v. Heckler, 760 F.2d 993, 995 (9th Cir. 1985)
- Hammock v. Bowen, 879 F.2d 498, 501 (9th Cir. 1989)
- Sprague v. Bowen, 812 F.2d 1226, 1229-30 (9th Cir. 1987)
- Thomas v. Barnhart, 278 F.3d 947, 954 (9th Cir. 2002)
- Burkhardt v. Bowen, 856 F.2d 1335, 1338 (9th Cir. 1988)
- Quang Van Han v. Bower, 882 F.2d 1453, 1456 (9th Cir. 1989)
- Terry v. Sullivan, 903 F.2d 1273, 1275 (9th Cir. 1990)
- Gallant v. Heckler, 753 F.2d 1450, 1452 (9th Cir. 1984)
- Hoffman v. Heckler, 785 F.2d 1423, 1425 (9th Cir. 1986)
- Hammock v. Bowen, 867 F.2d 1209, 1212-1213 (9th Cir. 1989)
- Valencia v. Heckler, 751 F.2d 1082, 1085 (9th Cir. 1985)
- Perez v. Astrue, 250 Fed. App'x 774, 776 (9th Cir. 2007)
- Burkett v. Berryhill, 732 Fed.Appx. 547, 551 (9th Cir. 2018)
- Howard ex rel. Wolff v. Barnhart, 341 F.3d 1006, 1012 (9th Cir. 2003)
- Carmickle v. Commissioner of Social Security, 533 F.3d 1155, 1165 (9th Cir. 2008)

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