

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
OHIO, WESTERN DIVISION

Paige C. v. Commissioner of Social Security

Case No. 1:25-cv-00072 (S.D. Ohio Dec. 23, 2025) (Report and Recommendation) · No. 1:25-cv-00072 ·
Decided December 23, 2025

SUMMARY

This Report and Recommendation addresses Paige C.’s challenge to the Commissioner of Social Security’s denial of Child’s Insurance Benefits and Supplemental Security Income. The magistrate judge concludes that the ALJ failed to build an accurate and logical bridge between the evidence concerning Plaintiff’s physical impairments and the residual functional capacity assessment. The recommendation is that the Commissioner’s decision be reversed and the matter remanded for further proceedings.

CASE DETAILS

COURT	United States District Court for the Southern District of Ohio, Western Division
WRITING FOR THE COURT	Caroline H. Gentry
JURISDICTION	United States District Court for the Southern District of Ohio, Western Division
DECIDED	December 23, 2025
DOCKET	1:25-cv-00072
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Report and Recommendation on judicial review of the Commissioner's denial of applications for Disabled Child's Insurance Benefits and Supplemental Security Income.
STANDARD OF REVIEW	The court reviews whether the ALJ applied the correct legal standards and whether the ALJ's findings are supported by substantial evidence. The court may not try the case de novo, weigh conflicting evidence, or decide credibility, but legal error requires reversal even where substantial evidence may support the factual findings.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Paige C. v. Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

ada / disability

disability definition

PRACTICE AREAS

Social Security disability

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disability benefits

QUESTIONS PRESENTED

1. Whether the ALJ built an accurate and logical bridge between the medical evidence and the RFC.
2. Whether the ALJ properly evaluated Plaintiff's subjective symptoms under 20 C.F.R. § 404.1529 and SSR 16-3p.
3. Whether the ALJ's Step Five finding was supported by substantial evidence, including whether the vocational expert's testimony responded to a hypothetical that accurately portrayed Plaintiff's limitations.
4. Whether the sedentary jobs identified by the vocational expert were inconsistent with the RFC because they were semi-skilled rather than unskilled.

HOLDINGS

1. The ALJ's RFC determination was unsupported by substantial evidence because the ALJ did not adequately explain how the RFC accommodated Plaintiff's severe physical impairments and related nonexertional limitations.
2. The ALJ reversibly erred in evaluating Plaintiff's symptom severity by relying heavily on normal imaging, failing to consider significant evidence supporting Plaintiff's complaints, mischaracterizing her treatment as conservative management, and failing to adequately explain the treatment of complaints concerning fibromyalgia, POTS, gastroparesis, and endometriosis.
3. The ALJ's Step Five finding was unsupported by substantial evidence because the RFC did not accurately portray Plaintiff's impairments and limitations, and the vocational expert's testimony based on that RFC therefore could not support the finding.
4. Plaintiff's challenge to the characterization of the identified sedentary jobs as semi-skilled rather than unskilled was not well-taken, and in any event was harmless because the vocational expert also identified three unskilled light jobs consistent with the RFC.

KEY QUOTATIONS

"However, the ALJ did not explain how the RFC accommodates Plaintiff's physical impairments." (PageID 3671-72)

"Because EDS is similar to fibromyalgia, the undersigned concludes that the ALJ impermissibly relied upon a lack of supporting objective evidence to minimize the severity of the symptoms of EDS." (PageID 3684)

"The ALJ's RFC therefore does not accurately portray Plaintiff's impairments and limitations." (PageID 3700)

FACTUAL BACKGROUND

Plaintiff alleged disability beginning March 28, 2022, based on multiple physical and mental impairments, including Ehlers-Danlos Syndrome, fibromyalgia, POTS, endometriosis, gastroparesis, PTSD, bipolar depression, and generalized anxiety disorder. The ALJ found that Plaintiff had severe impairments but retained the residual functional capacity for a reduced range of light work with physical and mental restrictions. The magistrate judge concluded that the ALJ inadequately explained how the RFC accounted for Plaintiff's chronic pain, fatigue, joint subluxations, nausea and vomiting, and other nonexertional limitations, and improperly evaluated her symptom complaints.

PROCEDURAL HISTORY

Plaintiff applied for Child's Insurance Benefits and SSI in April 2022. The claims were denied initially and on reconsideration; following a hearing, the ALJ found that Plaintiff was not disabled, and the Appeals Council denied review. Plaintiff filed this action seeking reversal and an award of benefits or, alternatively, further proceedings. The magistrate judge recommended reversal and remand under Sentence Four of 42 U.S.C. § 405(g), subject to objections and review by the district judge.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remand under Sentence Four of 42 U.S.C. § 405(g) for further proceedings. The ALJ should further develop the record as necessary, particularly concerning Plaintiff's subjective complaints and physical limitations, evaluate the evidence under the applicable regulations, rulings, and case law, and conduct the required five-step sequential analysis anew. No finding should be made that Plaintiff is disabled, and the case should be terminated on the district court docket after remand.

CASES CITED

- Bowen v. City of New York, 476 U.S. 467, 470 (1986)
- Koster v. Commissioner of Social Security, 643 F. App'x 466, 478 (6th Cir. 2016)
- Blakley v. Commissioner of Social Security, 581 F.3d 399, 406, 409-10 (6th Cir. 2009)
- Emard v. Commissioner of Social Security, 953 F.3d 844, 849 (6th Cir. 2020)
- Biestek v. Berryhill, 139 S. Ct. 1148, 1154 (2019)
- Mullen v. Bowen, 800 F.2d 535, 545 (6th Cir. 1986)
- Key v. Callahan, 109 F.3d 270, 273 (6th Cir. 1997)
- Rabbers v. Commissioner of Social Security, 582 F.3d 647, 651 (6th Cir. 2009)
- Cardew v. Commissioner of Social Security, 896 F.3d 742, 746 (6th Cir. 2018)
- Howard v. Commissioner of Social Security, 276 F.3d 235, 239, 241 (6th Cir. 2002)
- Scott K. v. Commissioner of the SSA, 2022 U.S. Dist. LEXIS 175673, at *11 (S.D. Ohio Sept. 27, 2022)

- *Amber S. v. Commissioner of the SSA*, 2023 U.S. Dist. LEXIS 171553, at *12 (S.D. Ohio Sept. 26, 2023)
- *Fleischer v. Astrue*, 774 F. Supp. 2d 875, 877 (N.D. Ohio)
- *Bailey v. Commissioner of Social Security*, 1999 U.S. App. LEXIS 12674, 1999 WL 96920, at *4 (6th Cir. Feb. 2, 1999)
- *Hurst v. Secretary of Health & Human Services*, 753 F.2d 517, 519 (6th Cir. 1985)
- *Hardiman v. Commissioner of Social Security*, 2013 U.S. Dist. LEXIS 99023, at *15 (S.D. Ohio July 16, 2013)
- *Smith v. Commissioner of Social Security*, 2017 WL 427359, at *7 (S.D. Ohio Feb. 1, 2017)
- *Correa v. Commissioner of Social Security*, 2023 U.S. Dist. LEXIS 231766, at *31 (N.D. Ohio Dec. 14, 2023)
- *Renstrom v. Astrue*, 680 F.3d 1057, 1067 (8th Cir. 2012)
- *Simons v. Barnhart*, 114 F. App'x 727, 733 (6th Cir. 2004)
- *Julie P. v. Commissioner of Social Security*, 2022 U.S. Dist. LEXIS 116490, at *13 (S.D. Ohio June 30, 2022)
- *Alevras v. Colvin*, 2015 U.S. Dist. LEXIS 59394, at *12 (N.D. Ill. May 6, 2015)
- *Gentry v. Commissioner of Social Security*, 741 F.3d 708, 723 (6th Cir.)
- *Minor v. Commissioner of Social Security*, 513 F. App'x 417, 435 (6th Cir. 2013)
- *Germany-Johnson v. Commissioner of Social Security*, 313 F. App'x 771, 777 (6th Cir. 2008)
- *Smith-Johnson v. Commissioner of Social Security*, 579 F. App'x 426, 437 n.11 (6th Cir. 2014)
- *Coffee v. Berryhill*, 2019 WL 302680, at *2-3 (N.D. Ind. Jan. 22, 2019)
- *Austin v. Colvin*, 2014 WL 6807841, at *4 (N.D. Ill. Dec. 2, 2014)
- *Haley v. Saul*, 2021 WL 3400804, at *4 (N.D. Ind. Aug. 4, 2021)
- *Gibson v. Kijakazi*, 2021 WL 5828035, at *2-3 (W.D. Ky. Dec. 8, 2021)
- *Varley v. Secretary of Health & Human Services*, 820 F.2d 777, 779 (6th Cir. 1987)
- *O'Banner v. Secretary of Health, Education & Welfare*, 587 F.2d 321, 323 (6th Cir. 1978)
- *Melkonyan v. Sullivan*, 501 U.S. 89, 99 (1991)
- *Felisky v. Bowen*, 35 F.3d 1027, 1041 (6th Cir. 1994)
- *Faucher v. Secretary of Health & Human Services*, 17 F.3d 171, 176 (6th Cir. 1994)
- *Thomas v. Arn*, 474 U.S. 140 (1985)
- *United States v. Walters*, 638 F.2d 947, 949-50 (6th Cir. 1981)