

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Patrick Ryan Sumner v. Commissioner of Social Security

Sumner · No. 1:25-cv-00176-EPG · Decided January 7, 2026

SUMMARY

The United States District Court for the Eastern District of California reviewed the Commissioner of Social Security’s denial of Patrick Ryan Sumner’s disability benefits claim. The court held that the ALJ inadequately evaluated the supportability and consistency of the treating psychiatrist’s mental residual functional capacity assessment, reversed the Commissioner’s decision, and remanded for further proceedings.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	January 7, 2026
DOCKET	1:25-cv-00176-EPG
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying his application for Social Security disability benefits.
STANDARD OF REVIEW	The court reviewed the Commissioner's factual findings for substantial evidence under 42 U.S.C. § 405(g). Substantial evidence means more than a mere scintilla but less than a preponderance, or such relevant evidence as a reasonable mind might accept as adequate to support a conclusion.
PRECEDENTIAL VALUE	unpublished district court opinion; precedential status unknown
PARTIES	Patrick Ryan Sumner v. Commissioner of Social Security

TOPICS

- judicial review of agency action
- administrative law
- ada / disability

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the ALJ adequately evaluated the supportability and consistency of treating psychiatrist Dwayne R. Depry's mental residual functional capacity opinion under the applicable Social Security regulations.
2. Whether the ALJ's rejection of Dr. Depry's opinion was supported by substantial evidence.

HOLDINGS

1. The ALJ failed to provide an adequate supportability and consistency analysis and failed to adequately explain why Dr. Depry's opinion was unpersuasive.

KEY QUOTATIONS

“Substantial evidence means “more than a mere scintilla,” Richardson v. Perales, 402 U.S. 389, 402 (1971), but less than a preponderance.” (at 2)

“Without more specificity, this citation does not provide substantial evidence for the ALJ's finding.” (at 5)

“For these reasons, the Court concludes that the ALJ's finding that Dr. Depry's opinion was not persuasive was not adequately explained and is not supported by substantial evidence.” (at 7)

FACTUAL BACKGROUND

Patrick Ryan Sumner applied for SSDI benefits alleging disability beginning March 6, 2022. His treating psychiatrist, Dwayne R. Depry, D.O., completed a mental residual functional capacity questionnaire describing significant limitations attributable to bipolar disorder, post-traumatic stress disorder, medication effects, and related symptoms. The ALJ discounted that opinion as inconsistent with the record, generally normal mental-status examinations, and activities of daily living, but cited only a broad 1,139-page exhibit and did not identify specific supporting evidence. The district court found that the record also contained treatment notes and emergency-room evidence reflecting serious psychiatric symptoms that the ALJ did not adequately address.

PROCEDURAL HISTORY

Plaintiff applied for SSDI benefits, was denied initially and on reconsideration, and received an unfavorable decision from an Administrative Law Judge on October 23, 2024. The Appeals Council denied review on December 16, 2024. Plaintiff then filed this action, and the parties consented to final judgment by a magistrate judge under 28 U.S.C. § 636(c).

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The case was remanded for further proceedings consistent with the order, including properly evaluating and, if necessary, incorporating Dr. Depry's mental residual functional capacity assessment into the RFC.

CASES CITED

- Robbins v. Soc. Sec. Admin., 466 F.3d 880, 883 (9th Cir. 2006)
- Richardson v. Perales, 402 U.S. 389, 401-02 (1971)
- Sorenson v. Weinberger, 514 F.2d 1112, 1119 n.10 (9th Cir. 1975)
- Woods v. Kijakazi, 32 F.4th 785, 787, 792 (9th Cir. 2022)

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