

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
ARKANSAS, CENTRAL DIVISION

Mary Smith-Jones v. Social Security Administration, Commissioner

Smith-Jones · No. 4:25-CV-00304-LPR-ERE · Decided November 24, 2025

SUMMARY

The document is a Recommended Disposition in a Social Security disability appeal before the United States District Court for the Eastern District of Arkansas. The magistrate judge recommends affirming the Commissioner’s denial of benefits, concluding that the ALJ properly assessed the claimant’s residual functional capacity, evaluated the medical opinions and subjective complaints, developed the record, and determined that she could perform her past relevant work. The disposition was dated November 24, 2025.

CASE DETAILS

COURT	United States District Court for the Eastern District of Arkansas, Central Division
JURISDICTION	United States District Court for the Eastern District of Arkansas, Central Division
DECIDED	November 24, 2025
DOCKET	4:25-CV-00304-LPR-ERE
DISPOSITION	affirmed
PROCEDURAL POSTURE	Social Security disability claimant sought judicial review of the Commissioner's final decision denying benefits. The magistrate judge issued a recommended disposition recommending that the district court affirm the Commissioner's decision and enter judgment for the Commissioner.
STANDARD OF REVIEW	The court reviews the Commissioner's decision for legal error and determines whether it is supported by substantial evidence on the record as a whole. Substantial evidence means enough evidence that a reasonable mind would find adequate to support the ALJ's decision; the court considers both evidence supporting the decision and evidence supporting a contrary outcome, but does not reverse merely because substantial evidence also supports the opposite result.
PRECEDENTIAL VALUE	unknown; recommended disposition with no reporter citation

PARTIES

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QUESTIONS PRESENTED

1. Whether the ALJ adequately assessed Smith-Jones's residual functional capacity without mechanically specifying every function of sedentary work.
2. Whether the ALJ properly evaluated the medical opinion evidence.
3. Whether the ALJ failed to fully and fairly develop the administrative record by not recontacting the consultative examiner or ordering additional testing.
4. Whether the ALJ properly evaluated Smith-Jones's subjective complaints.
5. Whether substantial evidence supported the ALJ's step-four finding that Smith-Jones could perform her past relevant work.

HOLDINGS

1. The ALJ did not err by describing Smith-Jones's capacity as sedentary work with specified additional limitations rather than mechanically listing every function associated with sedentary work.
2. The ALJ properly evaluated the consultative and state-agency medical opinions and was not required to adopt any opinion line by line.
3. The ALJ was not required to recontact Dr. Eberle or order additional testing because the existing record was sufficient to decide the disability claim.
4. The ALJ properly evaluated Smith-Jones's subjective complaints, and substantial evidence supported the conclusion that her allegations of debilitating pain were inconsistent with the record.
5. The ALJ properly determined that Smith-Jones could perform her past relevant work as a coordinator in skill training and as a secretary as those jobs are generally performed in the national economy.

KEY QUOTATIONS

“The Court will not reverse the Commissioner’s decision, however, “merely because substantial evidence exists for the opposite decision.”” (III.A)

“Rather, the RFC finding is an administrative determination that is “based on all of the relevant evidence.”” (III.C.3)

“Where the claimant has the residual functional capacity to do either the specific work previously done or the same type of work as it is generally performed in the national economy, the claimant is found not to be

disabled.” (III.C.5)

FACTUAL BACKGROUND

Smith-Jones alleged disability beginning July 1, 2022, based principally on neck, spine, and knee problems, along with sleep apnea, obesity, depression, and anxiety. The ALJ found several severe impairments but concluded that none, alone or in combination, met or equaled a listed impairment, and assessed a sedentary residual functional capacity with postural, neck-movement, and mental limitations. Based on vocational-expert testimony, the ALJ found that Smith-Jones could perform her past relevant work as a coordinator in a skill-training program and as a secretary as those jobs are generally performed in the national economy.

PROCEDURAL HISTORY

Smith-Jones applied for benefits on August 1, 2022, alleging disability based on neck problems. The claim was denied initially and on reconsideration; following a February 14, 2024 administrative hearing, the ALJ found her not disabled on April 12, 2024. The Appeals Council denied review, making the ALJ's decision the Commissioner's final decision, which Smith-Jones challenged in the district court.

DISPOSITION

affirmed

CASES CITED

- Brown v. Colvin, 825 F.3d 936, 939 (8th Cir. 2016)
- Halverson v. Astrue, 600 F.3d 922, 929 (8th Cir. 2010)
- Slusser v. Astrue, 557 F.3d 923, 925 (8th Cir. 2009)
- Milam v. Colvin, 794 F.3d 978, 983, 985 (8th Cir. 2015)
- Long v. Chater, 108 F.3d 185, 187 (8th Cir. 1997)
- Nash v. Commissioner of Social Security Administration, 907 F.3d 1086, 1090-91 (8th Cir. 2018)
- McCoy v. Astrue, 648 F.3d 605, 615 (8th Cir. 2011)
- Menter v. Kijakazi, No. 6:20-CV-003198-DGK, 2022 WL 188146, at *2 (W.D. Mo. Jan. 20, 2022)
- Duvall v. Bisignano, No. 4:25-cv-00120 KGB-PSH, 2025 WL 1812626, n.6 (E.D. Ark. July 1, 2025)
- Locher v. Sullivan, 968 F.2d 725, 728 (8th Cir. 1992)
- Moore v. Astrue, 572 F.3d 520, 524 (8th Cir. 2009)
- Prosch v. Apfel, 201 F.3d 1010, 1013 (8th Cir. 2000)
- Perkins v. Astrue, 648 F.3d 892, 897 (8th Cir. 2011)
- Hensley v. Colvin, 829 F.3d 926, 932 (8th Cir. 2016)
- Masterson v. Barnhart, 363 F.3d 731, 738-39 (8th Cir. 2004)
- Norwood v. Kijakazi, No. 21-3560, 2022 WL 1740785, at *1 (8th Cir. May 31, 2022) (unpublished per curiam)
- Phillips v. Saul, No. 1:19-CV-00034-BD, 2020 WL 3451519, at *2 (E.D. Ark. June 24, 2020)

- Martise v. Astrue, 641 F.3d 909, 926-27 (8th Cir. 2011)
- Schwandt v. Berryhill, 926 F.3d 1004, 1012 (8th Cir. 2019)
- Perks v. Astrue, 687 F.3d 1086, 1092 (8th Cir. 2012)
- Wagner v. Astrue, 499 F.3d 842, 853-54 (8th Cir. 2007)
- Lowe v. Apfel, 226 F.3d 969, 973 (8th Cir. 2000)

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