

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF  
CALIFORNIA

Andrea Macias v. Commissioner of Social Security

No. 2:23-cv-1983-SCR · No. 2:23-cv-1983-SCR · Decided April 3, 2025

SUMMARY

The United States District Court for the Eastern District of California reviewed the Commissioner of Social Security’s denial of Andrea Macias’s applications for disability insurance benefits and supplemental security income. The court found the administrative record incomplete and identified unresolved conflicts and ambiguities concerning medical opinions and the claimant’s physical and mental impairments. It granted both parties’ summary judgment motions in part, vacated the Commissioner’s decision, and remanded for further proceedings and development of the record.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Eastern District of California                                                                                                                                                                                                                                                                                                                                                                                                                    |
| WRITING FOR THE COURT | Sean C. Riordan                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
| JURISDICTION          | United States District Court for the Eastern District of California                                                                                                                                                                                                                                                                                                                                                                                                                    |
| DECIDED               | April 3, 2025                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| DOCKET                | 2:23-cv-1983-SCR                                                                                                                                                                                                                                                                                                                                                                                                                                                                       |
| DISPOSITION           | vacated                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |
| PROCEDURAL POSTURE    | Plaintiff sought judicial review of the Commissioner's final denial of her applications for disability insurance benefits and Supplemental Security Income. The parties filed cross-motions for summary judgment and agreed that the ALJ committed legal error, disputing only whether the case should be remanded for an award of benefits or for further administrative proceedings.                                                                                                 |
| STANDARD OF REVIEW    | The Commissioner's decision is upheld if supported by substantial evidence and based on the correct legal standards. Substantial evidence is more than a mere scintilla but less than a preponderance. The court reviews the record as a whole, may not substitute its judgment for the Commissioner's, and may affirm only on grounds stated by the ALJ. Harmless error applies only when it is clear that the error was inconsequential to the ultimate nondisability determination. |
| PRECEDENTIAL VALUE    | Unknown; district court amended order with no reporter citation.                                                                                                                                                                                                                                                                                                                                                                                                                       |

## PARTIES

Andrea Macias v. Commissioner of Social Security

## TOPICS

judicial review of agency action

administrative law

summary judgment

remedies

civil procedure

## PRACTICE AREAS

Social Security disability

administrative law

federal civil procedure

## QUESTIONS PRESENTED

1. Whether the Commissioner's second unfavorable disability decision should be remanded for an award of benefits or for further administrative proceedings after the parties agreed that the ALJ committed legal error.
2. Whether the record was sufficiently developed and free from conflicts and ambiguities to permit the court to credit improperly rejected evidence as true and direct an award of benefits.

## HOLDINGS

1. Remand for an award of benefits was not appropriate because the administrative record was incomplete and contained unresolved conflicts and ambiguities concerning both Plaintiff's physical and mental impairments.
2. Further administrative proceedings were required to develop the record concerning Plaintiff's physical limitations and mental impairments.
3. Conflicts between the State agency medical consultants' functional assessments and Dr. Romanowski's more restrictive assessment could not be resolved on the incomplete record and precluded an immediate award of benefits.

## KEY QUOTATIONS

*"The claimant bears the burden of proof in the first four steps of the sequential evaluation process."* (at 5)

*"Essentially, the court cannot direct the Commissioner to provide benefits unless "further administrative proceedings would serve no useful purpose[.]""* (at 7)

*"The record is insufficient as to both Plaintiff's physical limitations and her mental impairments."* (at 8)

*"The record contains a conflict between medical opinions that the Court cannot resolve at this point in time."* (at 10)

## FACTUAL BACKGROUND

Plaintiff alleged disability beginning July 11, 2018, based on serious burns and resulting skin grafts, impaired mobility, upper-body pain, depression, and anxiety. The ALJ found severe physical and mental impairments but determined that Plaintiff retained the residual functional capacity for restricted light work and could perform jobs existing in significant numbers in the national economy. The administrative record contained evidence both

supporting and contradicting the claimed severity of Plaintiff's limitations, including conflicting medical opinions concerning her ability to sit, stand, and walk.

## PROCEDURAL HISTORY

Plaintiff applied for DIB and SSI in July 2019, and the applications were denied initially and on reconsideration. After an unfavorable ALJ decision and Appeals Council denial, Plaintiff filed a prior federal action, which was remanded by stipulation in February 2022 for reevaluation of the medical record and residual functional capacity. Following a second hearing, the ALJ again found Plaintiff not disabled, and the Appeals Council denied review. Plaintiff then filed this action; the district court granted both cross-motions for summary judgment in part, vacated the Commissioner's decision, and remanded for further proceedings.

## DISPOSITION

vacated

## REMAND INSTRUCTIONS

The Commissioner's final decision was vacated and remanded for further proceedings, including further development of the administrative record concerning Plaintiff's physical limitations and mental impairments and reconsideration of the conflicting evidence and medical opinions.

## CASES CITED

- Bowen v. City of New York, 476 U.S. 467, 470 (1986)
- Washington State Department of Social and Health Services v. Guardianship Estate of Keffeler, 537 U.S. 371, 375 (2003)
- Howard ex rel. Wolff v. Barnhart, 341 F.3d 1006, 1011 (9th Cir. 2003)
- Andrews v. Shalala, 53 F.3d 1035, 1039 (9th Cir. 1995)
- Molina v. Astrue, 674 F.3d 1104, 1111 (9th Cir. 2012)
- Richardson v. Perales, 402 U.S. 389, 401 (1971)
- Widmark v. Barnhart, 454 F.3d 1063, 1066 (9th Cir. 2006)
- Desrosiers v. Secretary of Health and Human Services, 846 F.2d 573, 576 (9th Cir. 1988)
- Jones v. Heckler, 760 F.2d 993, 995 (9th Cir. 1985)
- Edlund v. Massanari, 253 F.3d 1152, 1156 (9th Cir. 2001)
- Thomas v. Barnhart, 278 F.3d 947, 954 (9th Cir. 2002)
- Orn v. Astrue, 495 F.3d 625, 630 (9th Cir. 2007)
- Connett v. Barnhart, 340 F.3d 871, 874 (9th Cir. 2003)
- Robbins v. Social Security Administration, 466 F.3d 880, 885 (9th Cir. 2006)
- Stout v. Social Security Administration, 454 F.3d 1050, 1055 (9th Cir. 2006)
- Burch v. Barnhart, 400 F.3d 676, 679 (9th Cir. 2005)
- Bowen v. Yuckert, 482 U.S. 137, 140, 146 n.5 (1987)

- Barnhart v. Thomas, 540 U.S. 20, 24-25 (2003)
- Hill v. Astrue, 698 F.3d 1153, 1161 (9th Cir. 2012)
- Dominguez v. Colvin, 808 F.3d 403, 407-08 (9th Cir. 2016)
- Garrison v. Colvin, 759 F.3d 995, 1021-22 (9th Cir. 2014)
- Benecke v. Barnhart, 379 F.3d 587, 595 (9th Cir. 2004)
- Stacy v. Colvin, 825 F.3d 563, 567 (9th Cir. 2016)
- Thomas v. Bible, 983 F.2d 152, 154 (9th Cir. 1993)

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