

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
TENNESSEE

Anita J. Burton v. Commissioner of Social Security

Case No. 4:25-CV-20 · No. 4:25-CV-20 · Decided April 16, 2026

SUMMARY

The United States District Court for the Eastern District of Tennessee reviews a Social Security disability determination under 42 U.S.C. § 405(g). The court holds that the administrative law judge inadequately explained the standing and walking limitations adopted in the residual functional capacity assessment and failed to address a consultative examiner’s sitting limitation. The matter is remanded under sentence four of § 405(g) for further proceedings and a new decision.

CASE DETAILS

COURT	United States District Court for the Eastern District of Tennessee
WRITING FOR THE COURT	Cynthia Richardson Wyrick
JURISDICTION	United States District Court for the Eastern District of Tennessee
DECIDED	April 16, 2026
DOCKET	4:25-CV-20
DISPOSITION	remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying Social Security benefits. The parties consented to magistrate-judge jurisdiction under 28 U.S.C. § 636(c).
STANDARD OF REVIEW	The court reviews whether substantial evidence supports the ALJ's factual findings and whether the Commissioner applied the relevant legal standards. It may not conduct de novo review, resolve evidentiary conflicts, or decide credibility questions. A decision supported by substantial evidence will not be upheld, however, if the Social Security Administration failed to follow its own regulations and the error prejudiced the claimant or deprived her of a substantial right.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Anita J. Burton v. Commissioner of Social Security

TOPICS

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether the ALJ adequately explained the basis for limiting Burton's standing and walking to two to four hours in an eight-hour workday.
2. Whether the ALJ adequately addressed the consultative examiner's opinion that Burton was limited to four to six hours of sitting in an eight-hour workday.
3. Whether the ALJ's failure to explain the adopted residual-functional-capacity limitations required remand under 42 U.S.C. § 405(g).

HOLDINGS

1. The ALJ's statement that he selected a midpoint between conflicting medical opinions did not adequately explain why the adopted two-to-four-hour standing and walking limitation accurately reflected Burton's functional capacity.
2. The ALJ erred by failing to state whether he considered the consultative examiner's opinion that Burton could sit only four to six hours in an eight-hour workday and, if considered, why he rejected that limitation.
3. Remand to the Commissioner was required because the ALJ failed to conform to the relevant legal standards when explaining Burton's residual functional capacity.

KEY QUOTATIONS

"A review of the Commissioner's findings is narrow. The Court is limited to determining (1) whether substantial evidence supported the factual findings of the Administrative Law Judge ("ALJ") and (2) whether the Commissioner conformed to the relevant legal standards." (Analysis, Section I)

"At the same time, an ALJ must adequately explain why he chose to include the specific limitations that he did in formulating a claimant's RFC so that the Court can then conduct a meaningful review of the ALJ's decision." (Analysis, Section II)

"The problem presented by the ALJ's failure to provide a more meaningful explanation of why he adopted the standing and walking limitations that he did for Claimant is further complicated by his failure to address the sitting limitations imposed by Dr. Wilson." (Analysis, Section II)

FACTUAL BACKGROUND

The state-agency reviewers opined that Burton could stand and walk for approximately six hours in an eight-hour workday, while consultative examiner Woodrow Wilson opined that she could stand and walk for two to four hours each per day and sit for four to six hours. The ALJ limited Burton's standing and walking to two to four hours per eight-hour workday, describing that limitation as a midpoint between the medical opinions, but

did not adequately explain the basis for that choice. The ALJ also posed a vocational-expert hypothetical assuming that Burton could sit for eight hours and did not explain whether or why he rejected Wilson's sitting limitation.

PROCEDURAL HISTORY

Burton filed this action on April 24, 2025, challenging the Commissioner's final administrative decision. She argued that the ALJ inadequately explained the standing and walking limitations in her residual functional capacity and failed to address a consultative examiner's sitting limitation. After briefing and oral argument, the court remanded the matter to the Commissioner under sentence four of 42 U.S.C. § 405(g).

DISPOSITION

remanded

REMAND INSTRUCTIONS

The Commissioner shall further develop the record if necessary to determine whether Burton is disabled, offer her a new hearing, explain with specificity the sitting, standing, and walking limitations adopted in formulating her residual functional capacity in light of the record evidence, and issue a new decision.

CASES CITED

- Blakely v. Comm'r of Soc. Sec., 581 F.3d 399, 405 (6th Cir. 2009)
- Rogers v. Comm'r of Soc. Sec., 486 F.3d 234, 241 (6th Cir. 2007)
- Cutlip v. Sec'y of Health & Human Servs., 25 F.3d 284, 286 (6th Cir. 1994)
- Payne v. Comm'r of Soc. Sec., 402 F. App'x 109, 111 (6th Cir. 2010)
- LeMaster v. Sec'y of Health & Human Servs., 802 F.2d 839, 841 (6th Cir. 1986)
- Emard v. Comm'r of Soc. Sec., 953 F.3d 844, 849 (6th Cir. 2020)
- Huizar v. Berryhill, 610 F. Supp. 3d 1010, 1015 (E.D. Mich. 2022)
- Heston v. Comm'r of Soc. Sec., 245 F.3d 528, 535 (6th Cir. 2001)
- Wright-Hines v. Comm'r of Soc. Sec., 597 F.3d 392, 395 (6th Cir. 2010)
- Richardson v. Saul, 511 F. Supp. 3d 791, 797 (E.D. Ky. 2021)
- Bowen v. Comm'r of Soc. Sec., 478 F.3d 742, 746 (6th Cir. 2007)
- Ackles v. Comm'r of Soc. Sec., 470 F. Supp. 3d 744, 752 (N.D. Ohio 2020)
- Colvin v. Barnhart, 475 F.3d 727, 730 (6th Cir. 2007)
- Jones v. Comm'r of Soc. Sec., 336 F.3d 469, 474 (6th Cir. 2003)
- It v. Berryhill, 392 F. Supp. 3d 831, 855 (M.D. Tenn. 2019)
- Reinartz v. Comm'r of Soc. Sec., 795 Fed.Appx. 448, 449 (W.D. Mich. 2020)
- Karge v. Comm'r of Soc. Sec. 414 Fed.Appx 739, 749 (6th Cir. 2011)
- Shalala v. Schaefer, 509 U.S. 292, 296, 113 S. Ct. 2625, 2629 (1993)
- Melkonyan v. Sullivan, 501 U.S. 89, 97-98, 111 S. Ct. 2157, 2163 (1991)

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