

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Lancaster v. Commissioner of Social Security

Lancaster · No. 1:20-cv-01796-JLT-BAM · Decided April 22, 2025

SUMMARY

The magistrate judge recommends reversing the Commissioner of Social Security’s denial of Ferwilda Lancaster’s application for Supplemental Security Income and remanding for further proceedings. The court concludes that the administrative law judge failed to provide specific, clear, and convincing reasons for discounting Lancaster’s subjective symptom testimony concerning her migraine headaches. The recommendation directs entry of judgment for Lancaster, subject to the parties’ opportunity to file objections.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Barbara A. McAuliffe
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	April 22, 2025
DOCKET	1:20-cv-01796-JLT-BAM
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Findings and recommendations on Plaintiff's motion for summary judgment seeking judicial review of the Commissioner's denial of Supplemental Security Income benefits.
STANDARD OF REVIEW	The court reviews the Commissioner's factual findings for substantial evidence and reviews whether the Commissioner applied the proper legal standards. Substantial evidence is more than a mere scintilla but less than a preponderance and is such relevant evidence as a reasonable mind might accept as adequate to support a conclusion.
PRECEDENTIAL VALUE	unpublished
PARTIES	Ferwilda Lancaster v. Leland Dudek, Acting Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

summary judgment

civil procedure

PRACTICE AREAS

Social Security disability

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ provided legally sufficient reasons for discounting Lancaster's subjective symptom testimony concerning her migraine headaches.
2. Whether the ALJ's denial of Supplemental Security Income was supported by substantial evidence and based on proper legal standards.
3. Whether the appropriate remedy was remand for further administrative proceedings or an immediate award of benefits.

HOLDINGS

1. Because the ALJ found that Plaintiff's medically determinable impairments could reasonably be expected to cause her alleged symptoms and there was no finding of malingering, the ALJ was required to provide specific, clear, and convincing reasons for rejecting the alleged severity of Plaintiff's migraine symptoms. The ALJ failed to do so.
2. The ALJ did not properly use Plaintiff's limited cooking, cleaning, shopping, and related daily activities to discount her migraine symptom testimony.
3. The ALJ did not properly rely on conservative or effective treatment as a basis for discounting Plaintiff's migraine symptom testimony.
4. Remand for further administrative proceedings was appropriate rather than an immediate award of benefits.

KEY QUOTATIONS

"However, the cited medical evidence does not undermine Plaintiff's testimony regarding her migraines." (at 7)

"The Court therefore may not attempt to intuit the ALJ's reasoning in discounting Plaintiff's migraine symptoms testimony." (at 10)

"As the ALJ failed to utilize or articulate proper bases for evaluating Plaintiff's symptoms testimony, the ALJ erred in assessing Plaintiff's symptoms testimony regarding migraines." (at 11)

FACTUAL BACKGROUND

Lancaster applied for Supplemental Security Income based on multiple physical and mental impairments, including migraine headaches, diabetes, asthma, hypertension, obesity, depression, lumbar disc degeneration, hip and knee disorders, and peripheral neuropathy. She testified that migraines remained frequent and severe, sometimes reaching 7/10 or 8/10 intensity, requiring her to lie down and being triggered by strong chemicals and

smells. The ALJ found that her impairments could reasonably cause her symptoms but discounted her testimony and found that she retained the residual functional capacity for a restricted range of medium work. The district court concluded that the ALJ failed to adequately explain why the medical evidence, daily activities, and treatment history undermined her migraine testimony.

PROCEDURAL HISTORY

Lancaster applied for Title XVI Supplemental Security Income, alleging disability beginning December 31, 2009. The application was denied initially and on reconsideration; following a hearing, an ALJ denied benefits on May 11, 2020, and the Appeals Council denied review. Lancaster then sought review in the district court. Magistrate Judge McAuliffe recommended granting Plaintiff's appeal, reversing the agency's denial, and entering judgment for Plaintiff, subject to review by the assigned district judge and any objections under 28 U.S.C. § 636(b)(1).

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

On remand, the ALJ should specifically address Plaintiff's symptom testimony regarding her migraines and conduct further administrative proceedings consistent with the court's findings.

CASES CITED

- Richardson v. Perales, 402 U.S. 389, 401-02 (1971)
- Sorenson v. Weinberger, 514 F.2d 1112, 1119 n.10 (9th Cir. 1975)
- Jones v. Heckler, 760 F.2d 993, 995 (9th Cir. 1985)
- Burkhart v. Bowen, 856 F.2d 1335, 1338 (9th Cir. 1988)
- Sanchez v. Secretary of Health and Human Services, 812 F.2d 509, 510 (9th Cir. 1987)
- Quang Van Han v. Bowen, 882 F.2d 1453, 1456 (9th Cir. 1989)
- Terry v. Sullivan, 903 F.2d 1273, 1275 (9th Cir. 1990)
- Garrison v. Colvin, 759 F.3d 995, 1014-15 (9th Cir. 2014)
- Batson v. Commissioner, 359 F.3d 1190, 1196 (9th Cir. 2004)
- Burch v. Barnhart, 400 F.3d 676, 681 (9th Cir. 2005)
- Molina v. Astrue, 674 F.3d 1104, 1112-13 (9th Cir. 2012)
- Cooper v. Bowen, 815 F.2d 557, 561 (9th Cir. 1987)
- Smith v. Califano, 637 F.2d 968, 971 (3d Cir. 1981)
- Vertigan v. Halter, 260 F.3d 1044, 1050 (9th Cir. 2001)
- Parra v. Astrue, 481 F.3d 742, 750-51 (9th Cir. 2007)
- Warre v. Commissioner of Social Security Administration, 439 F.3d 1001, 1006 (9th Cir. 2006)
- Block v. Berryhill, No. 2:16-cv-2230-EFB, 2018 WL 1567814, at *5 (E.D. Cal. Mar. 31, 2018)

- Moon v. Colvin, 139 F. Supp. 3d 1211, 1220 (D. Or. 2015)
- Wheeler v. Kijakazi, No. 1:21-cv-1225 JLT BAM, 2023 WL 4146215, at *4 (E.D. Cal. June 23, 2023)
- Bray v. Commissioner of Social Security Administration, 554 F.3d 1219, 1225 (9th Cir. 2009)
- Harman v. Apfel, 211 F.3d 1172, 1175-78 (9th Cir. 2000)
- Dominguez v. Colvin, 808 F.3d 403, 407 (9th Cir. 2015)
- Wilkerson v. Wheeler, 772 F.3d 834, 839 (9th Cir. 2014)
- Baxter v. Sullivan, 923 F.2d 1391, 1394 (9th Cir. 1991)

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