

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
ALABAMA, MIDDLE DIVISION

Annette Jones v. Social Security Administration, Commissioner

No. 4:25-cv-120-AMM (N.D. Ala. Jan. 20, 2026) · No. 4:25-cv-120-AMM · Decided January 20, 2026

SUMMARY

The United States District Court for the Northern District of Alabama reviews the Commissioner of Social Security’s denial of Annette Jones’s claim for disability insurance benefits. The court holds that the Administrative Law Judge applied the correct legal standards and that substantial evidence supports the evaluation of the medical opinion evidence and residual functional capacity. The court therefore affirms the Commissioner’s decision.

CASE DETAILS

COURT	United States District Court for the Northern District of Alabama, Middle Division
JURISDICTION	United States District Court for the Northern District of Alabama, Middle Division
DECIDED	January 20, 2026
DOCKET	4:25-cv-120-AMM
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying her application for a period of disability and disability insurance benefits.
STANDARD OF REVIEW	The court reviewed whether the record contained substantial evidence supporting the ALJ's decision and whether the correct legal standards were applied. The court could not reweigh the evidence, reconsider the facts, or substitute its judgment for that of the Commissioner.
PRECEDENTIAL VALUE	unpublished
PARTIES	Annette Jones v. Social Security Administration, Commissioner

TOPICS

- judicial review of agency action
- agency adjudication
- administrative law
- disability definition

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the ALJ properly evaluated the medical opinion of Ivonne Joiner, C.R.N.P., under 20 C.F.R. § 404.1520c.
2. Whether substantial evidence supported the ALJ's residual functional capacity determination.
3. Whether the ALJ failed to reconcile an apparent conflict between the Dictionary of Occupational Titles and vocational-expert testimony at step five.
4. Whether the ALJ's hypothetical question to the vocational expert included all of Jones's supported impairments and limitations.
5. Whether the ALJ properly evaluated Jones's subjective statements concerning the intensity, persistence, and limiting effects of her symptoms.

HOLDINGS

1. The ALJ properly applied 20 C.F.R. § 404.1520c and reasonably found Joiner's opinion unpersuasive because it was inadequately supported, internally inconsistent, and inconsistent with the broader medical record.
2. The ALJ's residual functional capacity determination was adequately explained and supported by substantial evidence.
3. The ALJ did not err by failing to reconcile an alleged conflict between the Dictionary of Occupational Titles and the vocational expert's testimony because the alleged conflict was based on Jones's misreading of the record; the RFC permitted carrying out detailed, but not complex, instructions.
4. The ALJ's hypothetical question properly incorporated all limitations included in the residual functional capacity, and the vocational expert's testimony therefore constituted substantial evidence for the step-five finding.
5. The ALJ properly applied the Eleventh Circuit pain standard and adequately explained why Jones's statements concerning the intensity, persistence, and limiting effects of her symptoms were not entirely consistent with the evidence.

KEY QUOTATIONS

“The ALJ applied the correct legal standards in evaluating N.P. Joiner’s opinion, and substantial evidence supports his finding that it was not persuasive.” (R. 36)

“The court discerns no error in the ALJ’s residual functional capacity analysis.” (R. 39)

“The ALJ’s determination that Ms. Jones is not disabled is supported by substantial evidence. The Commissioner’s final decision is therefore affirmed.” (Conclusion)

FACTUAL BACKGROUND

Jones alleged disability beginning August 15, 2021, based on blindness or low vision, fibromyalgia, degenerative and pain-related conditions, bipolar disorder, anxiety, and mood disorder. The ALJ found severe impairments including obesity, degenerative disc disease, fibromyalgia, loss of central visual acuity, depression, bipolar disorder, anxiety disorder, and amphetamine use disorder, but determined that Jones retained the residual functional capacity for light work with postural, environmental, visual, and mental limitations. Although she could not perform her past relevant work, vocational-expert testimony identified other jobs existing in significant numbers in the national economy. The district court concluded that substantial evidence supported the ALJ's evaluation of the medical opinion evidence, residual functional capacity, step-five finding, hypothetical questioning, and subjective complaints.

PROCEDURAL HISTORY

Jones protectively filed a Title II benefits application on September 8, 2021. The SSA denied the application initially and on reconsideration; after a January 2, 2024 telephone hearing, the ALJ found Jones not disabled on March 20, 2024. The Appeals Council denied review on November 26, 2024, and Jones filed this action on January 23, 2025. The district court affirmed the Commissioner's decision.

DISPOSITION

affirmed

CASES CITED

- Walker v. Social Security Administration, 987 F.3d 1333, 1338 (11th Cir. 2021)
- Lamb v. Bowen, 847 F.2d 698, 701 (11th Cir. 1988)
- Chester v. Bowen, 792 F.2d 129, 131 (11th Cir. 1986)
- Ted Martin v. Louis W. Sullivan, Secretary of the Department of Health and Human Services, Martin v. Sullivan, 894 F.2d 1520, 1529 (11th Cir. 1990)
- Bloodsworth v. Heckler, 703 F.2d 1233, 1239 (11th Cir. 1983)
- Bridges v. Bowen, 815 F.2d 622, 624 (11th Cir. 1987)
- Arnold v. Heckler, 732 F.2d 881, 883 (11th Cir. 1984)
- Bowen v. Heckler, 748 F.2d 629, 635 (11th Cir. 1984)
- Thaxton v. Kijakazi, No. 1:20-cv-00616-SRW, 2022 WL 983156, at *8 (M.D. Ala. Mar. 30, 2022)
- Hale v. Brown, 831 F.2d 1007, 1011 (11th Cir. 1987)
- Jones v. Apfel, 190 F.3d 1224, 1229 (11th Cir. 1999)
- Wilson v. Barnhart, 284 F.3d 1219, 1227 (11th Cir. 2002)
- Crawford v. Commissioner, 363 F.3d 1155, 1161 (11th Cir. 2004)
- Edwards v. Sullivan, 937 F.2d 580, 584 (11th Cir. 1991)
- Foote v. Chater, 67 F.3d 1553, 1561 (11th Cir. 1995)
- Dyer v. Barnhart, 395 F.3d 1206, 1210 (11th Cir. 2005)
- McCruter v. Bowen, 791 F.2d 1544, 1548 (11th Cir. 1986)

- *Jacobus v. Commissioner of Social Security*, 664 F. App'x 774, 776 (11th Cir. 2016)
- *Hand v. Heckler*, 761 F.2d 1545, 1548-49 (11th Cir. 1985)
- *Hand v. Bowen*, 793 F.2d 275 (11th Cir. 1986)
- *Mitchell v. Commissioner, Social Security Administration*, 771 F.3d 780, 782 (11th Cir. 2014)
- *Ortega v. Chater*, 933 F. Supp. 1071, 1076 (S.D. Fla. 1996)
- *Werner v. Commissioner of Social Security*, 421 F. App'x 935, 939 (11th Cir. 2011)

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