

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
NEW YORK

Niccole M. v. Commissioner of Social Security

No. 5:25-cv-00090 (N.D.N.Y. Mar. 6, 2026) · No. 5:25-cv-90 (DJS) · Decided March 6, 2026

SUMMARY

The Northern District of New York granted Plaintiff's motion for judgment on the pleadings, denied the Commissioner's motion, and remanded the Social Security disability case for further proceedings under sentence four of 42 U.S.C. § 405(g). The court held that the ALJ inadequately explained the evaluation of a treating physician's medical source statement and failed to make clear whether the treating physician rule was properly applied. The court declined to remand solely for calculation of benefits.

CASE DETAILS

COURT	United States District Court for the Northern District of New York
WRITING FOR THE COURT	Daniel J. Stewart
JURISDICTION	United States District Court for the Northern District of New York
DECIDED	March 6, 2026
DOCKET	5:25-cv-90 (DJS)
DISPOSITION	remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's partially favorable Social Security disability determination. The parties filed cross-motions for judgment on the pleadings.
STANDARD OF REVIEW	The Commissioner's decision is upheld if the correct legal standards were applied and the decision is supported by substantial evidence. The reviewing court considers the whole record, including evidence detracting from the Commissioner's determination, but may not conduct a de novo disability determination or substitute its judgment for that of the Commissioner.
PRECEDENTIAL VALUE	unpublished district court decision; nonprecedential
PARTIES	Niccole M. v. Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

motion for judgment on the pleadings

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PRACTICE AREAS

Social Security disability

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federal civil procedure

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ applied the treating physician rule when evaluating the medical source statement attributed to Dr. Reid.
2. Whether substantial evidence and adequate explanation supported the ALJ's rejection of the medical source statement and related medical opinions.
3. Whether the matter should be remanded for further administrative proceedings or solely for calculation of benefits.

HOLDINGS

1. Remand was required because the ALJ did not identify the author of the medical source statement as a treating physician, making it impossible to determine whether the treating physician rule was applied.
2. The ALJ erred by grouping the medical source statement with other opinions and concluding, without adequate record support, that it was based on limited evaluations and Plaintiff's subjective complaints.
3. The case was remanded for further administrative proceedings and reconsideration, not solely for calculation of benefits.

KEY QUOTATIONS

"Ultimately, it is the ALJ's responsibility to "build a logical bridge between the record evidence and her conclusions" to enable meaningful review." (13)

"However, delay alone is an insufficient basis on which to remand for benefits." (14)

FACTUAL BACKGROUND

Plaintiff, born in 1969, had at least a ninth-grade education and no work since 2006, with past work as a hotel dishwasher, cashier, and retail clerk. She alleged disability based principally on fibromyalgia, anxiety, depression, cervical and lumbar problems, and shoulder symptoms. The ALJ found severe physical and mental impairments and assessed an RFC for a restricted range of light work, finding Plaintiff not disabled before April 11, 2024 and disabled beginning on that date. The court focused on the ALJ's treatment of a medical source statement attributed to treating physician Dr. Reid and the ALJ's unsupported characterization of that statement as based on limited evaluations and subjective complaints.

PROCEDURAL HISTORY

Plaintiff filed applications for supplemental security income and disability insurance benefits in 2015. After multiple administrative hearings, unfavorable ALJ decisions, prior federal-court remands, and an Appeals

Council remand, ALJ Mary Pelton issued a partially favorable decision finding Plaintiff disabled beginning April 11, 2024, but not disabled before that date. Plaintiff challenged the RFC and evaluation of medical opinion evidence. The court granted Plaintiff's motion for judgment on the pleadings, denied Defendant's motion, and remanded under sentence four of 42 U.S.C. § 405(g) for further proceedings.

DISPOSITION

remanded

REMAND INSTRUCTIONS

The matter is remanded pursuant to sentence four of 42 U.S.C. § 405(g) for further proceedings, reconsideration, evaluation of the full record, proper consideration of the medical source statement and treating physician rule, and further explanation of the ALJ's conclusions. The remand is not limited to calculation of benefits.

CASES CITED

- Wagner v. Sec'y of Health & Human Servs., 906 F.2d 856, 860 (2d Cir. 1990)
- Johnson v. Bowen, 817 F.2d 983, 986 (2d Cir. 1987)
- Grey v. Heckler, 721 F.2d 41, 46 (2d Cir. 1983)
- Marcus v. Califano, 615 F.2d 23, 27 (2d Cir. 1979)
- Richardson v. Perales, 402 U.S. 389, 401 (1971)
- Rutherford v. Schweiker, 685 F.2d 60, 62 (2d Cir. 1982)
- Williams v. Bowen, 859 F.2d 255, 258 (2d Cir. 1988)
- Rosado v. Sullivan, 805 F. Supp. 147, 153 (S.D.N.Y. 1992)
- Valente v. Sec'y of Health & Human Servs., 733 F.2d 1037, 1041 (2d Cir. 1984)
- Bowen v. Yuckert, 482 U.S. 137, 140-42 (1987)
- Berry v. Schweiker, 675 F.2d 464, 467 (2d Cir. 1982)
- McIntyre v. Colvin, 758 F.3d 146, 150 (2d Cir. 2014)
- Barnhart v. Thompson, 540 U.S. 20, 24 (2003)
- Tucker v. Comm'r of Soc. Sec., 2025 WL 1374660, at *1 (2d Cir. May 13, 2025)
- Brathwaite v. Barnhart, 2007 WL 5322447, at *12 (S.D.N.Y. Dec. 20, 2007), report and recommendation adopted, 2008 WL 2669351 (S.D.N.Y. June 26, 2008)
- Fuller v. Comm'r of Soc. Sec., 2015 WL 5512383, at *6, *8, *10 (N.D.N.Y. Sept. 16, 2015)
- Joseph v. O'Malley, 772 F. Supp. 3d 265, 275 (E.D.N.Y. 2024)
- Lisa E. v. Comm'r of Soc. Sec., 2021 WL 4472469, at *7-*8, *10 (W.D.N.Y. Sept. 30, 2021)
- Sonia A. v. Bisignano, 2026 WL 496922, at *3 (N.D.N.Y. Feb. 23, 2026)
- Beth Marie N. v. Comm'r of Soc. Sec., 2023 WL 6065309, at *6 (N.D.N.Y. Aug. 9, 2023), report and recommendation adopted, 2023 WL 6065945 (N.D.N.Y. Sept. 18, 2023)
- Lisa S. v. Comm'r of Soc. Sec., 2026 WL 111477, at *1 (N.D.N.Y. Jan. 15, 2025)
- Butts v. Barnhart, 416 F.3d 101, 103 (2d Cir. 2005)

- Mari Eli S.D. on behalf of S.Y.C.S. v. Comm’r of Soc. Sec., 2024 WL 4204254, at *13 (N.D.N.Y. Aug. 19, 2024), report and recommendation adopted, 2024 WL 4203972 (N.D.N.Y. Sept. 16, 2024)
- Black v. Berryhill, 2018 WL 4501063, at *7 (W.D.N.Y. Sept. 20, 2018)

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