

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
LOUISIANA, LAFAYETTE DIVISION

Marie Edwards v. U.S. Commissioner, Social Security Administration

Edwards · No. 6:24-CV-01493 · Decided January 8, 2026

SUMMARY

The United States District Court for the Western District of Louisiana recommends reversing and remanding the Commissioner of Social Security’s denial of Marie Edwards’s disability insurance and SSI benefits. The court concludes that the ALJ inadequately assessed Edwards’s residual functional capacity, improperly relied on the Medical-Vocational Guidelines despite alleged nonexertional limitations, failed to make an individualized assessment of the erosion of the sedentary occupational base, and did not adequately consider medication side effects.

CASE DETAILS

COURT	United States District Court for the Western District of Louisiana, Lafayette Division
WRITING FOR THE COURT	Carol B. Whitehurst
JURISDICTION	United States District Court for the Western District of Louisiana, Lafayette Division
DECIDED	January 8, 2026
DOCKET	6:24-CV-01493
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Report and recommendation on judicial review of the Commissioner's denial of disability insurance benefits and supplemental security income benefits.
STANDARD OF REVIEW	The court reviews whether substantial evidence supports the Commissioner's decision and whether the proper legal standards were used. It must examine the entire record but may not reweigh the evidence, substitute its judgment for the Commissioner's, reassess credibility, or independently resolve evidentiary conflicts.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Marie Edwards v. U.S. Commissioner, Social Security Administration

TOPICS

judicial review of agency action

exhaustion of remedies

standard of review

administrative law

appellate procedure

PRACTICE AREAS

Social Security disability

administrative law

federal judicial review

QUESTIONS PRESENTED

1. Whether the ALJ had a rational, medical, and evidentiary basis for finding that Edwards could perform the full range of sedentary work.
2. Whether the Commissioner could rely solely on the Medical-Vocational Guidelines despite evidence of pain, swelling, limited ability to stand and sit, and other nonexertional impairments.
3. Whether the ALJ was required to make an individualized assessment of the erosion of the sedentary occupational base.
4. Whether the ALJ erred by failing to consider the documented side effects of Edwards's medications in assessing residual functional capacity.

HOLDINGS

1. When a claimant has nonexertional impairments or a combination of exertional and nonexertional impairments that affect residual functional capacity, the Commissioner may not rely exclusively on the Medical-Vocational Guidelines and must obtain vocational evidence establishing that suitable jobs exist in the economy.
2. A finding that a claimant cannot perform the full range of sedentary work does not automatically establish disability, but the Commissioner must make an individualized determination addressing the type and extent of the limitations, erosion of the sedentary occupational base, and the claimant's vocational factors.
3. In assessing residual functional capacity, the ALJ must consider the effects of treatment, including medication side effects, when supported by the record.
4. The Commissioner's decision should be reversed and remanded under sentence four of 42 U.S.C. § 405(g) for reevaluation of Edwards's residual functional capacity and further administrative action.

KEY QUOTATIONS

“If, however, the claimant suffers from nonexertional impairments or a combination of exertional and nonexertional impairments, then the Commissioner must rely on a vocational expert to establish that such jobs exist in the economy.” (at 20)

“The Court finds the record devoid of such an individualized determination.” (at 20)

FACTUAL BACKGROUND

Edwards alleged disability from chronic right-leg pain and functional limitations following radiation treatment and surgical removal of a right-thigh spindle-cell sarcoma, as well as rheumatoid arthritis, osteoarthritis, diabetes, and obesity. The record documented persistent pain, swelling, difficulty walking and performing household and personal-care activities, use of a walker, physical-therapy deficits, and medication side effects including drowsiness, dizziness, and vertigo. The ALJ found that she could perform the full range of sedentary work and relied on the Medical-Vocational Guidelines to find her not disabled, despite evidence of nonexertional limitations and a 2024 rheumatoid-arthritis diagnosis.

PROCEDURAL HISTORY

Edwards applied for disability insurance benefits and SSI, alleging disability beginning March 12, 2021. After the applications were denied, she received a telephone hearing before ALJ Robert Grant, who found her not disabled on June 3, 2024. The Appeals Council denied review, making the ALJ's decision the Commissioner's final decision for judicial-review purposes. Edwards then filed this action, and the magistrate judge recommended reversal and sentence-four remand for further administrative proceedings.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Commissioner should reevaluate Edwards's residual functional capacity, including her nonexertional limitations, the impact of her 2024 rheumatoid-arthritis diagnosis, medication side effects, and the need for vocational evidence and an individualized assessment of the sedentary occupational base.

CASES CITED

- *Higginbotham v. Barnhart*, 405 F.3d 332, 336 (5th Cir. 2005)
- *Villa v. Sullivan*, 895 F.2d 1019, 1021 (5th Cir. 1990)
- *Martinez v. Chater*, 64 F.3d 172, 173 (5th Cir. 1995)
- *Hames v. Heckler*, 707 F.2d 162, 164 (5th Cir. 1983)
- *Hollis v. Bowen*, 837 F.2d 1378, 1383 (5th Cir. 1988)
- *Scott v. Heckler*, 770 F.2d 482, 485 (5th Cir. 1985)
- *Wren v. Sullivan*, 925 F.2d 123, 126 (5th Cir. 1991)
- *Smith v. Berryhill*, 139 S. Ct. 1865, 1772 (2019)
- *Graves v. Colvin*, 837 F.3d 589, 592 (5th Cir. 2016)
- *Bowling v. Shalala*, 36 F.3d 431, 435 (5th Cir. 1994)
- *Fraga v. Bowen*, 810 F.2d 1296, 1304 (5th Cir. 1987)
- *Perez v. Barnhart*, 415 F.3d 457, 461 (5th Cir. 2005)
- *Greenspan v. Shalala*, 38 F.3d 232, 236 (5th Cir. 1994)
- *Lovelace v. Bowen*, 813 F.2d 55, 58 (5th Cir. 1987)

- *Newton v. Apfel*, 209 F.3d 448, 458 (5th Cir. 2000)
- *Ripley v. Chater*, 67 F.3d 552, 557 (5th Cir. 1995)
- *Chambliss v. Massanari*, 269 F.3d 520, 522 (5th Cir. 2001)
- *Loya v. Heckler*, 707 F.2d 211, 215 (5th Cir. 1983)
- *Giles v. Astrue*, 433 Fed. App'x 241, 245 (5th Cir. 2011)
- *Richard v. Sullivan*, 955 F.2d 354 (5th Cir. 1992)
- *Shalala v. Schaefer*, 509 U.S. 292 (1993)
- *Douglass v. United Services Automobile Association*, 79 F.3d 1415 (5th Cir. 1996) (en banc)

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