

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NEW YORK

Linda W. v. Commissioner of Social Security

Linda W. · No. 1:23-cv-1005-JJM · Decided March 17, 2026

SUMMARY

The court affirmed the Commissioner of Social Security’s denial of the plaintiff’s application for supplemental security income. It held that the administrative law judge’s residual functional capacity determination, including the treatment of medical opinions, sit/stand limitations, and environmental restrictions, was supported by substantial evidence and free of legal error. The court also concluded that any error concerning environmental limitations would be harmless because the plaintiff’s past relevant work did not involve the identified environmental hazards.

CASE DETAILS

COURT	United States District Court for the Western District of New York
WRITING FOR THE COURT	Jeremiah J. McCarthy
JURISDICTION	United States District Court for the Western District of New York
DECIDED	March 17, 2026
DOCKET	1:23-cv-1005-JJM
DISPOSITION	other
PROCEDURAL POSTURE	Action under 42 U.S.C. §§ 405(g) and 1383(c)(3) seeking review of the Commissioner's denial of supplemental security income; the parties filed cross-motions for judgment on the pleadings.
STANDARD OF REVIEW	The court may set aside the Commissioner's determination only when the factual findings are unsupported by substantial evidence or the decision is based on legal error. The court defers to the ALJ's resolution of conflicting evidence and reviews whether the correct legal standards were applied and whether the determination is supported by substantial evidence.
PRECEDENTIAL VALUE	unpublished
PARTIES	Linda W. v. Commissioner of Social Security

TOPICS

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the ALJ properly evaluated the consultative examiner's opinion and was required to include a sit/stand option in the residual functional capacity.
2. Whether the ALJ adequately explained the residual functional capacity's environmental limitations concerning fumes, odors, dusts, gases, and poor ventilation.
3. Whether any error in assessing environmental limitations required remand.

HOLDINGS

1. The ALJ properly evaluated the medical opinion evidence and was not required to include a sit/stand option because the residual functional capacity was supported by substantial evidence and the consultative examiner's statements were not functionally specific.
2. The ALJ adequately explained the environmental limitations included in the RFC, and the finding that plaintiff needed to avoid concentrated exposure to respiratory irritants was supported by substantial evidence.
3. Even if the ALJ should have imposed greater environmental restrictions, remand was not required because plaintiff's past relevant jobs did not involve exposure to the relevant environmental hazards.

KEY QUOTATIONS

"Having reviewed their submissions [14, 18, 26], the Commissioner's motion is granted, and plaintiff's motion is denied." (at 1)

"A district court may set aside the Commissioner's determination that a claimant is not disabled only if the factual findings are not supported by 'substantial evidence' or if the decision is based on legal error." (at 3)

"It is well-established that the ALJ, not any medical source, is responsible for formulating a claimant's RFC." (at 4)

FACTUAL BACKGROUND

Linda W. alleged disability based on asthma, atrial fibrillation, and arthritis, later described in the ALJ's decision as including obesity, cervical and lumbar degenerative disc disease, vertigo, chronic bronchitis, and vasovagal syndrome. She testified that breathing and exertional activities were difficult and that she had limitations with sitting, standing, walking, and exposure to respiratory irritants. Consultative examiner Dr. Nikita Dave identified possible mild to moderate limitations and possible avoidance of smoke, dust, chemicals, temperature extremes, and humidity, while state-agency consultants found she could perform light work with postural and environmental restrictions. The ALJ found that plaintiff retained the residual functional capacity for light work with postural and environmental limitations and could perform her past relevant work.

PROCEDURAL HISTORY

Plaintiff applied for supplemental security income, alleging disability beginning in April 2002. The claim was denied initially and on reconsideration, and an ALJ denied the claim after a December 28, 2021 hearing. The court reviewed the administrative decision and granted the Commissioner's motion for judgment on the pleadings while denying plaintiff's motion.

DISPOSITION

other

CASES CITED

- Shaw v. Chater, 221 F.3d 126, 131 (2d Cir. 2000)
- Consolidated Edison Co. of New York, Inc. v. NLRB, 305 U.S. 197, 229 (1938)
- Biestek v. Berryhill, 587 U.S. 97, 103 (2019)
- Colgan v. Kijakazi, 22 F.4th 353, 359 (2d Cir. 2022)
- Talavera v. Astrue, 697 F.3d 145, 151 (2d Cir. 2012)
- Cichocki v. Astrue, 729 F.3d 172, 177 (2d Cir. 2013)
- Curry v. Commissioner of Social Security, 855 F. App'x 46, 48 (2d Cir. 2021)
- Schillo v. Kijakazi, 31 F.4th 64, 78 (2d Cir. 2022)
- Matta v. Astrue, 508 F. App'x 53, 56 (2d Cir. 2013)
- Douglas C. v. Commissioner of Social Security, 717 F. Supp. 3d 289, 298 (W.D.N.Y. 2024)
- Steven R. v. Commissioner of Social Security, 2025 WL 762195, at *8 (E.D.N.Y. 2025)
- Camille v. Colvin, 652 F. App'x 25, 28 (2d Cir. 2016)
- Selian v. Astrue, 708 F.3d 409, 421 (2d Cir. 2013)
- Curry v. Apfel, 209 F.3d 117, 123 (2d Cir. 2000)
- Blau v. Berryhill, 395 F. Supp. 3d 266, 281 (S.D.N.Y. 2019)
- Christina J. v. Commissioner of Social Security, 695 F. Supp. 3d 357, 362 (W.D.N.Y. 2023)
- Morris v. Berryhill, 721 F. App'x 25, 29 (2d Cir. 2018)
- Jacob K. v. Commissioner of Social Security, 2021 WL 4324379, at *4 (W.D.N.Y. 2021)
- John C. v. Kijakazi, 2024 WL 3040240, at *2 (W.D.N.Y. 2024)
- Mark P. O. v. O'Malley, 2024 WL 1219632, at *8 (N.D.N.Y. 2024)