

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
OHIO, WESTERN DIVISION

James C. v. Commissioner of Social Security

James C. · No. 2:25-cv-231 · Decided February 24, 2026

SUMMARY

This Report and Recommendation addresses a Social Security disability appeal in the Southern District of Ohio. The plaintiff challenged the Administrative Law Judge’s evaluation of a consultative examiner’s opinion, particularly the asserted need for additional short breaks. The magistrate judge concluded that the ALJ properly evaluated the medical opinion and that the finding of non-disability was supported by substantial evidence, recommending affirmance and closure of the case.

CASE DETAILS

COURT	United States District Court for the Southern District of Ohio, Western Division
WRITING FOR THE COURT	Stephanie K. Bowman
JURISDICTION	United States District Court for the Southern District of Ohio, Western Division
DECIDED	February 24, 2026
DOCKET	2:25-cv-231
DISPOSITION	other
PROCEDURAL POSTURE	Report and recommendation in a Social Security appeal under 42 U.S.C. § 405(g), recommending affirmance of the Commissioner's denial of benefits.
STANDARD OF REVIEW	The Commissioner’s factual findings must be affirmed if supported by substantial evidence and made under the correct legal standards. Substantial evidence is such relevant evidence as a reasonable mind might accept as adequate to support a conclusion. The reviewing court may not reweigh evidence, resolve evidentiary conflicts, decide credibility questions de novo, or reverse merely because substantial evidence could support a different conclusion.
PRECEDENTIAL VALUE	Nonprecedential report and recommendation; no reporter citation or precedential designation appears.

PARTIES

James C. v. Commissioner of Social Security

TOPICS

judicial review of agency action

agency adjudication

administrative law

standard of review

appellate procedure

PRACTICE AREAS

Social Security disability

administrative law

federal appellate and judicial review procedure

QUESTIONS PRESENTED

1. Whether the ALJ properly evaluated the supportability and consistency of Dr. Rowland's medical opinion under 20 C.F.R. § 416.920c.
2. Whether substantial evidence supported the ALJ's finding that Plaintiff was not disabled.

HOLDINGS

1. The ALJ properly considered the supportability and consistency of Dr. Rowland's opinion and reasonably found the proposed need for additional short breaks unpersuasive.
2. The ALJ's finding that Plaintiff was not disabled was supported by substantial evidence and should be affirmed.

KEY QUOTATIONS

"Thus, as long as the ALJ's decision, when read as a whole, shows that she substantively considered the supportability and consistency factors, the ALJ's decision must be affirmed." (Tr. 1237)

"This court may not try the case de novo, resolve conflicts in the evidence, or decide questions of credibility." (Tr. 1240)

FACTUAL BACKGROUND

Plaintiff alleged disability beginning July 28, 2016, based on learning, affective, anxiety, ADHD, schizophrenia, and intermittent explosive or personality disorders. Following a prior remand, the ALJ found that Plaintiff retained the capacity for restricted work and could perform jobs such as janitor, hand packager, and laundry worker. Plaintiff challenged the ALJ's treatment of consultative examiner Susan Rowland's opinion, particularly the opinion that he would benefit from additional short breaks. The court concluded that the ALJ reasonably found that limitation vague, speculative, and inconsistent with largely normal mental-status findings and other record evidence.

PROCEDURAL HISTORY

James C. applied for child's insurance benefits and supplemental security income, and an ALJ denied both claims. The Appeals Council declined review, after which Plaintiff sought judicial review. The court previously remanded the case for a new administrative hearing; a second ALJ again denied benefits on December 12, 2024,

and Plaintiff returned to the district court challenging the evaluation of consultative examiner Dr. Susan Rowland's opinion. The magistrate judge recommended that the Commissioner's decision be affirmed and the case closed, subject to objections under Federal Rule of Civil Procedure 72(b).

DISPOSITION

other

CASES CITED

- Bowen v. City of New York, 476 U.S. 467, 469-70 (1986)
- Richardson v. Perales, 402 U.S. 389, 401 (1971)
- Hephner v. Mathews, 574 F.2d 359, 362 (6th Cir. 1978)
- Combs v. Commissioner of Social Security, 459 F.3d 640, 643 (6th Cir. 2006)
- Walters v. Commissioner of Social Security, 127 F.3d 525, 528-29 (6th Cir. 1997)
- Reusel v. Commissioner of Social Security, No. 5:20-CV-1291, 2021 WL 1697919, at *7 n.6 (N.D. Ohio Apr. 29, 2021)
- Crystal E.J. v. Commissioner of Social Security, No. 2:21-CV-04861, 2022 WL 2680069 (S.D. Ohio July 12, 2022)
- Fleischer v. Astrue, 774 F. Supp. 2d 875, 877 (N.D. Ohio 2011)
- Wilson v. Commissioner of Social Security, 378 F.3d 541, 544-46 (6th Cir. 2004)
- Garland v. Ming Dai, 593 U.S. 357, 369 (2021)
- Andrew E. v. Commissioner of Social Security, 2025 WL 724606, at *4 (S.D. Ohio Mar. 6, 2025)
- Chad T. v. Commissioner of Social Security Administration, 2022 WL 4355001, at *8 (S.D. Ohio Sept. 20, 2022)
- Dunlavy v. Commissioner of Social Security, No. 24-3333, 2024 WL 4558606, at *3 (6th Cir. Oct. 23, 2024)
- Mullins v. Secretary of Health and Human Services, 836 F.2d 980, 984 (6th Cir. 1987)
- Felisky v. Bowen, 35 F.3d 1027, 1036 (6th Cir. 1994)
- Hardaway v. Secretary of H.H.S., 823 F.2d 922, 928 (6th Cir. 1987)
- King v. Heckler, 742 F.2d 968, 974 (6th Cir. 1984)
- Kinsella v. Schweiker, 708 F.2d 1058, 1059 (6th Cir. 1983)
- Boyle v. Sullivan, 998 F.2d 342, 347 (6th Cir. 1993)
- Tyra v. Secretary of H.H.S., 896 F.2d 1024, 1028 (6th Cir. 1990)
- Walters v. Commissioner of Social Security, 127 F.3d 525, 528 (6th Cir. 1997)
- Biestek v. Berryhill, 139 S. Ct. 1148, 1154 (2019)
- Garner v. Heckler, 745 F.2d 383, 387 (6th Cir. 1984)
- Walker v. Secretary of Health & Human Services, 884 F.2d 241, 245 (6th Cir. 1989)
- Heston v. Commissioner of Social Security, 245 F.3d 528, 535 (6th Cir. 2001)
- Thomas v. Arn, 474 U.S. 140 (1985)

- United States v. Walters, 638 F.2d 947 (6th Cir. 1981)

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