

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NEW YORK

Michelle M. v. Commissioner of Social Security

Michelle M. · No. 25-CV-00445-HKS · Decided June 26, 2026

SUMMARY

The United States District Court for the Western District of New York reviews the denial of Michelle M. Mocniak’s application for Social Security disability insurance benefits. The court addresses challenges concerning migraine headaches, subjective symptom evaluation, mental-health limitations in the residual functional capacity assessment, and the step-five vocational determination. The excerpt concludes that the administrative law judge adequately considered the claimant’s limitations, but it ends before the court’s complete discussion of the step-five issue and disposition.

CASE DETAILS

COURT	United States District Court for the Western District of New York
WRITING FOR THE COURT	H. Kenneth Schroeder, Jr.
JURISDICTION	United States District Court for the Western District of New York
DECIDED	June 26, 2026
DOCKET	25-CV-00445-HKS
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's denial of disability insurance benefits. The parties consented to the assignment of the case to the magistrate judge for all proceedings, including entry of final judgment.
STANDARD OF REVIEW	The court reviews whether the Commissioner's conclusions are supported by substantial evidence and based on the correct legal standard. If the evidence is susceptible to more than one rational interpretation, the Commissioner's determination must be upheld.
PRECEDENTIAL VALUE	unpublished, nonprecedential
PARTIES	Michelle M. v. Commissioner of Social Security

TOPICS

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

PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ properly evaluated the limiting effects of plaintiff's migraine headaches and subjective complaints.
2. Whether the residual functional capacity adequately accounted for plaintiff's moderate limitation in adapting or managing herself.
3. Whether substantial evidence supported the step-five finding that plaintiff could perform jobs existing in significant numbers in the national economy.

HOLDINGS

1. The ALJ reasonably evaluated plaintiff's migraine headaches and subjective complaints, and substantial evidence supported the finding that the alleged intensity, persistence, and limiting effects of her symptoms were not fully consistent with the medical and other evidence.
2. The ALJ adequately accounted for plaintiff's moderate limitation in adapting or managing herself by limiting her to simple, unskilled work, simple workplace instructions and decisions, tasks of up to four steps, and no production-pace work.
3. Substantial evidence supported the ALJ's step-five determination because the vocational evidence identified approximately 35,000 sorter jobs nationally, and one job existing in the national economy is sufficient to support a finding that the claimant can perform other work.

KEY QUOTATIONS

"In reviewing a final decision of the SSA, this Court is limited to determining whether the SSA's conclusions were supported by substantial evidence in the record and were based on a correct legal standard." (Dkt. #3, p. 28)

"In sum, the Court concludes that the ALJ's decision was supported by substantial evidence and that the Commissioner's determination must be upheld." (Dkt. #3, p. 33)

FACTUAL BACKGROUND

Plaintiff alleged disability from migraines, neck and back pain, shoulder problems, depression, anxiety, bipolar disorder, and PTSD. She testified that migraines occurred approximately three times per week and that anxiety and panic symptoms impaired her daily functioning. The ALJ found severe physical and mental impairments but determined that plaintiff retained the residual functional capacity for a restricted range of sedentary work, including simple work and tasks of up to four steps. Relying on vocational-expert testimony, the ALJ found that plaintiff could perform document preparer, sorter, and addresser jobs existing in significant numbers nationally.

PROCEDURAL HISTORY

Plaintiff filed a claim for disability insurance benefits alleging disability beginning February 11, 2020. The claim was denied initially and on reconsideration. After a hearing, an ALJ issued an unfavorable decision on October 26, 2022. The Appeals Council vacated that decision and remanded for further proceedings because post-hearing evidence had not been proffered to plaintiff. Following a second hearing, the ALJ again found plaintiff not disabled on June 28, 2024, and the Appeals Council denied review. The district court denied plaintiff's motion for judgment on the pleadings, granted the Commissioner's motion, and closed the case.

DISPOSITION

other

CASES CITED

- Talavera v. Astrue, 697 F.3d 145, 151 (2d Cir.)
- Moran v. Astrue, 569 F.3d 496, 501 (2d Cir.)
- McIntyre v. Colvin, 758 F.3d 146, 149 (2d Cir.)
- Yancey v. Apfel, 145 F.3d 106, 111 (2d Cir.)
- Jacqueline L. v. Comm'r of Soc. Sec., 515 F. Supp.3d 2, 7 (W.D.N.Y. 2021)
- Rosario v. Comm'r of Soc. Sec., 20 Civ. 7749, 2022 WL 819810, at *8 (S.D.N.Y. Mar. 18, 2022)
- Andrew P. v. Comm'r of Soc. Sec., 719 F. Supp.3d 248, 255 (W.D.N.Y. 2024)
- Dorcas L. v. Comm'r of Soc. Sec., 8:25-CV-625 (DJS), 2026 WL 1492820, at *11-*12 (N.D.N.Y. May 28, 2026)
- Racquel K. v. Comm'r of Soc. Sec., 25-CV-00108-MJR, 2026 WL 1326318, at *3 (W.D.N.Y. May 13, 2026)
- Charles B. v. Comm'r of Soc. Sec., 8:24-CV-01232 (ML), 2025 WL 2816893, at *8 (N.D.N.Y. Sept. 26, 2025)
- Selena A. C. v. Comm'r of Soc. Sec., Case # 24-CV-6203-FPG, 2026 WL 570461, at *6 (W.D.N.Y. Mar. 2, 2026)
- Jessica P. v. Comm'r of Soc. Sec., 6:22-cv-6238-JJM, 2025 WL 428416, at *3-*4 (W.D.N.Y. Feb. 7, 2025)
- Deborah Elaine L. v. Comm'r of Soc. Sec., 6:20-CV-06607 EAW, 2022 WL 2662974, at *4 (W.D.N.Y. July 11, 2022)
- Angi W. v. Comm'r of Soc. Sec., 21-CV-0557 (CJS), 2023 WL 2595008, at *11 n.8 (W.D.N.Y. Mar. 22, 2023)