

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

Carla M. v. Commissioner of Social Security

Civil Action No. 2:24-cv-4250 · No. 2:24-cv-4250 · Decided February 17, 2026

SUMMARY

The United States District Court for the Southern District of Ohio reviews the denial of Carla M.'s application for Social Security disability insurance benefits. The court considers challenges to the administrative law judge's step-two findings, residual functional capacity assessment, evaluation of medical-source opinions, and vocational-expert testimony. The court overrules the plaintiff's statement of errors and affirms the Commissioner's decision.

CASE DETAILS

COURT	United States District Court for the Southern District of Ohio, Eastern Division
WRITING FOR THE COURT	Elizabeth A. Preston Deavers
JURISDICTION	United States District Court for the Southern District of Ohio
DECIDED	February 17, 2026
DOCKET	2:24-cv-4250
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying her application for disability insurance benefits.
STANDARD OF REVIEW	The Court must affirm the Commissioner's decision if it is supported by substantial evidence and was made pursuant to proper legal standards. Substantial evidence is more than a scintilla but less than a preponderance and is such relevant evidence as a reasonable mind might accept as adequate. The Court must consider evidence that detracts from the Commissioner's decision but may not reweigh the evidence or substitute its judgment for that of the Commissioner.
PRECEDENTIAL VALUE	persuasive
PARTIES	Carla M. v. Commissioner of Social Security

TOPICS

judicial review of agency action

agency adjudication

administrative law

PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ erred in evaluating the severity of Plaintiff's impairments at step two of the sequential evaluation.
2. Whether the ALJ considered all severe and non-severe impairments when formulating Plaintiff's residual functional capacity.
3. Whether the ALJ properly evaluated the medical opinions and prior administrative medical findings under 20 C.F.R. § 404.1520c.
4. Whether substantial evidence supported the ALJ's finding that Plaintiff could perform medium work.
5. Whether the hypothetical question posed to the vocational expert required remand because it did not expressly include the medium-exertional limitation.

HOLDINGS

1. The ALJ did not commit reversible error by classifying some impairments as non-severe because the ALJ identified other severe impairments and continued through the remaining steps of the sequential evaluation.
2. The ALJ adequately considered the effects of Plaintiff's physical and mental impairments, including alleged non-severe impairments, when formulating the residual functional capacity.
3. The ALJ adequately addressed the supportability and consistency of the opinions of Dr. Kurpita, Dr. Viers, and the state-agency reviewers, and substantial evidence supported the resulting persuasiveness findings.
4. Substantial evidence supported the ALJ's finding that Plaintiff retained the capacity to perform medium work with specified mental and social limitations.
5. The ALJ's failure to expressly include the medium-exertional limitation in the hypothetical question was not reversible error because the vocational expert identified jobs at the medium exertional level and the omission did not alter the outcome.

KEY QUOTATIONS

"The Court must affirm the Commissioner's decision if it 'is supported by substantial evidence and was made pursuant to proper legal standards.'" (at 5)

"the foundation of the ALJ's RFC does not have to be a physician's medical opinion, so long as the ALJ sufficiently "make[s] a connection between the evidence relied on and the conclusion reached.'" (at 25)

FACTUAL BACKGROUND

Plaintiff alleged disability beginning October 17, 2016, based on mental-health conditions, spinal conditions, obesity, thyroid disease, cardiac symptoms, gastrointestinal conditions, and sleep disorders. The ALJ found severe impairments consisting of obesity, degenerative disc and joint disease of the spine, affective disorders, and an anxiety disorder with panic, but found that Plaintiff retained the residual functional capacity for medium work with mental and social limitations. Relying on vocational-expert testimony, the ALJ found that Plaintiff could perform work existing in significant numbers in the national economy.

PROCEDURAL HISTORY

Plaintiff applied for disability insurance benefits, and the application was denied initially and on reconsideration. After a hearing, an ALJ denied benefits, and the Appeals Council denied review. In an earlier action, the parties jointly moved for remand, and the Court remanded the matter for further proceedings. On remand, a second ALJ again denied benefits. Plaintiff filed this action without seeking further Appeals Council review, and the Court overruled her statements of error and affirmed the Commissioner's decision.

DISPOSITION

affirmed

CASES CITED

- Rabbers v. Commissioner of Social Security, 582 F.3d 647, 651 (6th Cir. 2009)
- Rogers v. Commissioner of Social Security, 486 F.3d 234, 241 (6th Cir. 2007)
- Colvin v. Barnhart, 475 F.3d 727, 730 (6th Cir. 2007)
- Henley v. Astrue, 573 F.3d 263, 264 (6th Cir. 2009)
- Foster v. Halter, 279 F.3d 348, 354 (6th Cir. 2001)
- TNS, Inc. v. NLRB, 296 F.3d 384, 395 (6th Cir. 2002)
- Universal Camera Corp. v. NLRB, 340 U.S. 474, 487 (1951)
- Blakley v. Commissioner of Social Security, 581 F.3d 399, 406 (6th Cir. 2009)
- Key v. Callahan, 109 F.3d 270, 273 (6th Cir. 1997)
- Bowen v. Commissioner of Social Security, 478 F.3d 742, 746 (6th Cir. 2007)
- Moore v. Commissioner of Social Security, No. 2:20-CV-5114, 2021 WL 5149714, at *7 (S.D. Ohio Nov. 5, 2021)
- Jones v. Commissioner of Social Security, No. 3:15-cv-00428, 2017 WL 540923, at *6 (S.D. Ohio Feb. 10, 2017)
- Her v. Commissioner of Social Security, 203 F.3d 388, 391 (6th Cir. 1999)
- Smith v. Commissioner of Social Security, No. 2:20-CV-5473, 2021 WL 3883061, at *3 (S.D. Ohio Aug. 31, 2021)
- Heston v. Commissioner of Social Security, 245 F.3d 528, 534 (6th Cir. 2001)
- Hobbs v. Commissioner of Social Security, No. 1:14-cv-121, 2015 WL 4247160, at *5 (W.D. Mich. July 13, 2015)
- Anthony v. Astrue, 266 F. App'x 451, 457 (6th Cir. 2008)

- Maziarz v. Secretary of Health & Human Services, 837 F.2d 240, 244 (6th Cir. 1988)
- Sasha M. v. Commissioner, Case No. 2:22-cv-2101, 2023 WL 1793536, at *6 (S.D. Ohio Feb. 7, 2023)
- Cormany v. Commissioner of Social Security, No. 5:21-CV-933, 2022 WL 2611952, at *7 (N.D. Ohio May 20, 2022)
- Whetsel v. Commissioner of Social Security, 2017 WL 443499, at *8 (S.D. Ohio Feb. 2, 2017)
- Dyson v. Commissioner of Social Security, 786 F. App'x 586, 588 (6th Cir. 2019)
- Kristin H. v. Commissioner of Social Security, No. 2:22-CV-03869, 2024 WL 1340271, at *3 (S.D. Ohio Mar. 29, 2024)
- Putman v. Commissioner of Social Security, No. 2:20-CV-3895, 2021 WL 2700330, at *5 (S.D. Ohio July 1, 2021)
- Mosed v. Commissioner of Social Security, No. 14-CV-14357, 2016 WL 6211288 (E.D. Mich. Jan. 22, 2016)
- Coldiron v. Commissioner of Social Security, 391 F. App'x 435, 439 (6th Cir. 2010)
- Tucker v. Commissioner of Social Security, 775 F. App'x 220, 226 (6th Cir. 2019)
- Rudd v. Commissioner of Social Security, 531 F. App'x 719, 728 (6th Cir. 2013)
- Lankford v. Commissioner of Social Security, No. 1:17-CV-00206-SKL, 2018 WL 6816064, at *6 (E.D. Tenn. Dec. 27, 2018)