

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MICHIGAN

Connye L. v. Commissioner of Social Security

Civil Action No. 24-12828 (E.D. Mich. Jan. 15, 2026) · No. 24-12828 · Decided January 15, 2026

SUMMARY

The United States District Court for the Eastern District of Michigan reviews the Commissioner of Social Security’s denial of Conny[e] L.’s application for Supplemental Security Income. The court concludes that the Administrative Law Judge’s residual functional capacity assessment and finding that Plaintiff could perform a reduced range of light work were supported by substantial evidence, grants the Commissioner’s motion for summary judgment, and denies Plaintiff’s motion.

CASE DETAILS

COURT	United States District Court for the Eastern District of Michigan
WRITING FOR THE COURT	David R. Grand
JURISDICTION	United States District Court for the Eastern District of Michigan
DECIDED	January 15, 2026
DOCKET	24-12828
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 Supplemental Security Income. The parties filed cross-motions for summary judgment and consented to magistrate-judge jurisdiction under 28 U.S.C. § 636(c).
STANDARD OF REVIEW	The court must affirm the Commissioner's conclusions unless the Commissioner failed to apply the correct legal standard or made factual findings unsupported by substantial evidence. Substantial evidence means such relevant evidence as a reasonable mind might accept as adequate to support a conclusion; the threshold is more than a mere scintilla but is not high. The court reviews the record as a whole and must affirm even if it would have reached a different conclusion or if substantial evidence supports the opposite result.
PRECEDENTIAL VALUE	unpublished, nonprecedential federal district-court opinion

TOPICS

judicial review of agency action

administrative law

summary judgment

civil procedure

ada / disability

PRACTICE AREAS

Social Security disability

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ's RFC was internally inconsistent because it classified Plaintiff as capable of light work while limiting her to four hours of standing and walking in an eight-hour workday.
2. Whether the ALJ was required to classify Plaintiff as limited to sedentary work under the Medical-Vocational Guidelines because her exertional capacity fell between the sedentary and light ranges.
3. Whether the ALJ's evaluation of Plaintiff's neuropathy, fibromyalgia, obesity, degenerative disc disease, pain, balance problems, and concentration complaints was supported by substantial evidence.

HOLDINGS

1. A limitation to standing and walking for four hours in an eight-hour workday does not categorically preclude a reduced range of light work. The ALJ properly relied on vocational-expert testimony concerning jobs compatible with Plaintiff's specific RFC.
2. The ALJ was not required to apply a grid rule directing a finding of disability because Plaintiff's RFC fell between the sedentary and light ranges, and the ALJ appropriately consulted a vocational expert rather than mechanically applying a single exertional grid category.
3. Substantial evidence supported the ALJ's RFC assessment and conclusion that Plaintiff was not disabled under the Social Security Act.

KEY QUOTATIONS

"An individual who is limited to standing and walking for four hours in an eight-hour workday falls 'somewhere between the sedentary and light work categories.'" (PageID.48)

"The ALJ's decision in this regard followed the regulations and does not warrant remand." (PageID.48)

"For all of the foregoing reasons, the Court finds that the ALJ's determination that Plaintiff was not disabled during the relevant period is supported by substantial evidence in the record." (PageID.83)

FACTUAL BACKGROUND

Plaintiff applied for SSI alleging disability from constant back pain, neuropathy, and pain in her lower legs, thighs, hips, feet, and hands. The ALJ found severe impairments including degenerative disc disease, osteoarthritis, fibromyalgia, diabetes with neuropathy, obesity, depression, and anxiety. The ALJ assessed an RFC for a reduced range of light work, including no more than four hours of standing or walking in an eight-

hour day, and relied on vocational-expert testimony identifying three jobs available in significant numbers. The district court concluded that the medical findings and other record evidence substantially supported that RFC and the resulting nondisability determination.

PROCEDURAL HISTORY

Plaintiff's SSI application was denied initially on April 26, 2022, and on reconsideration on November 28, 2022. After an administrative hearing on July 20, 2023, the ALJ found Plaintiff not disabled on October 4, 2023. The Appeals Council denied review on August 29, 2024, making the ALJ's decision final. Plaintiff filed this action on October 27, 2024. The district court denied Plaintiff's motion for summary judgment and granted the Commissioner's motion.

DISPOSITION

affirmed

CASES CITED

- Colvin v. Barnhart, 475 F.3d 727, 730 (6th Cir. 2007)
- Scheuneman v. Commissioner of Social Security, No. 11-10593, 2011 WL 6937331, at *7 (E.D. Mich. Dec. 6, 2011)
- Heston v. Commissioner of Social Security, 245 F.3d 528, 534 (6th Cir. 2001)
- Preslar v. Secretary of Health & Human Services, 14 F.3d 1107, 1110 (6th Cir. 1994)
- Longworth v. Commissioner of Social Security, 402 F.3d 591, 595 (6th Cir. 2005)
- Biestek v. Berryhill, 139 S. Ct. 1148, 1154 (2019)
- Bass v. McMahon, 499 F.3d 506, 512-13 (6th Cir. 2007)
- Wyatt v. Secretary of Health & Human Services, 974 F.2d 680, 683 (6th Cir. 1992)
- Heston v. Commissioner of Social Security, 245 F.3d 528, 535 (6th Cir. 2001)
- Walker v. Secretary of Health & Human Services, 884 F.2d 241, 245 (6th Cir. 1989)
- Kornecky v. Commissioner of Social Security, 167 F. App'x 496, 508 (6th Cir. 2006)
- Cutlip v. Secretary of Health & Human Services, 25 F.3d 284, 286 (6th Cir. 1994)
- Blackburn v. Commissioner of Social Security, 748 F. App'x 45, 48 (6th Cir. 2018)
- Duffy v. Saul, No. 18-CV-12342-DJC, 2020 WL 871576, at *7 (D. Mass. Feb. 21, 2020)
- Esping v. Berryhill, No. 17-872 FLN, 2018 WL 3383433, at *7 (D. Minn. July 11, 2018)
- Sankhar v. Colvin, No. 03:14-cv-01644-HZ, 2015 WL 5664285, at *7 (D. Or. Sept. 21, 2015)
- Viera v. Commissioner of Social Security, No. CV 18-13476, 2019 WL 8750418, at *8 (E.D. Mich. Oct. 25, 2019), report and recommendation adopted, 2020 WL 1443445 (E.D. Mich. Mar. 25, 2020)
- Williams v. Kijakazi, No. 2:22-cv-11279, 2022 WL 20748275, at *11 (E.D. Mich. Nov. 22, 2022), report and recommendation adopted sub nom. Williams v. Commissioner of Social Security, 2023 WL 6367681 (E.D. Mich. Sept. 29, 2023)

- Piehl v. Commissioner of Social Security, No. 21-cv-11066, 2022 WL 1731438, at *3-4 (E.D. Mich. May 4, 2022), report and recommendation adopted, 2022 WL 1721446 (E.D. Mich. May 27, 2022)

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