

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NEW YORK

Shane S. v. Commissioner of Social Security

No. 1:24-cv-01028-MAV (W.D.N.Y. Mar. 18, 2026) · No. 1:24-cv-01028-MAV · Decided March 18, 2026

SUMMARY

The United States District Court for the Western District of New York denied Plaintiff Shane S.’s motion for judgment on the pleadings and granted the Commissioner of Social Security’s cross-motion. The court upheld the administrative law judge’s determination that Plaintiff was not disabled for purposes of Disability Insurance Benefits, concluding that the ALJ properly considered Plaintiff’s impairments and formulated a residual functional capacity supported by substantial evidence.

CASE DETAILS

COURT	United States District Court for the Western District of New York
WRITING FOR THE COURT	Meredith A. Vacca
JURISDICTION	United States District Court for the Western District of New York
DECIDED	March 18, 2026
DOCKET	1:24-cv-01028-MAV
DISPOSITION	other
PROCEDURAL POSTURE	Cross-motions for judgment on the pleadings under Federal Rule of Civil Procedure 12(c) in an action under 42 U.S.C. § 405(g) seeking review of the Commissioner's denial of Disability Insurance Benefits.
STANDARD OF REVIEW	The court reviews whether the Commissioner applied the correct legal standards and whether the decision is supported by substantial evidence. The court may not reweigh evidence or decide de novo whether the claimant is disabled.
PRECEDENTIAL VALUE	Unpublished or nonprecedential district court decision; no published reporter citation appears in the source.
PARTIES	Shane S. v. Commissioner of Social Security

TOPICS

- judicial review of agency action
- administrative law
- disability definition

PRACTICE AREAS

Social Security disability

administrative law

federal judicial review

QUESTIONS PRESENTED

1. Whether the ALJ erred by failing to consider Plaintiff's non-severe physical impairments and associated limitations in formulating the residual functional capacity.
2. Whether the ALJ improperly based the residual functional capacity on lay interpretation of the evidence and failed to provide a sufficient narrative explanation.
3. Whether remand was required because the ALJ did not perform an explicit function-by-function analysis of the residual functional capacity.

HOLDINGS

1. The ALJ was not required to analyze Plaintiff's non-severe physical impairments again in the residual functional capacity discussion because the ALJ found that those impairments caused no exertional or nonexertional limitations and therefore imposed no restrictions on work activities.
2. The ALJ did not improperly substitute lay judgment for medical opinion and adequately supported the RFC with substantial evidence from the complete record, including treatment records, examinations, activities, testimony, and medical-source opinions.
3. An explicit function-by-function analysis is not required where the ALJ applied the correct legal standards, sufficiently discussed the evidence, and reached an RFC determination supported by substantial evidence.

KEY QUOTATIONS

"[Plaintiff] is limited to simple, routine, repetitive tasks; simple work- related decisions with occasional interactions with supervisors, coworkers, and the general public, and occasional changes to the work setting and routine." (AR at 1250)

"In short, the ALJ applied the appropriate legal standards, formulated an RFC that was supported by substantial evidence, and included a narrative discussion that described the evidence supporting each of his conclusions, including by citing to specific medical facts and nonmedical evidence." (Discussion)

"For the foregoing reasons, Plaintiff Shane S.'s motion for judgment on the pleadings [ECF No. 6] is denied, and the Commissioner's motion for judgment on the pleadings [ECF No. 8] is granted." (Conclusion)

FACTUAL BACKGROUND

Plaintiff alleged disability beginning October 8, 2020, primarily based on PTSD, depression, and anxiety, and also identified several physical conditions, including carpal tunnel syndrome. After remand proceedings, the ALJ found three severe mental impairments but found Plaintiff's physical impairments non-severe and imposed no physical restrictions. The ALJ determined that Plaintiff retained the residual functional capacity for work at all exertional levels with limitations to simple, routine, repetitive tasks, simple work-related decisions, occasional

workplace interactions, and occasional changes, and found that jobs existed in significant numbers that Plaintiff could perform.

PROCEDURAL HISTORY

Plaintiff applied for Disability Insurance Benefits in February 2021 and was denied initially and on reconsideration. An ALJ denied benefits in May 2022, after which the Appeals Council denied review; the parties then stipulated to reversal and remand for further administrative proceedings. Following remand, the Appeals Council returned the matter to the ALJ, who again found Plaintiff not disabled on June 27, 2024. Plaintiff filed this action on October 28, 2024, and the parties filed cross-motions for judgment on the pleadings.

DISPOSITION

other

CASES CITED

- McIntyre v. Colvin, 758 F.3d 146, 150 (2d Cir. 2014)
- Melville v. Apfel, 198 F.3d 45, 51 (2d Cir. 1999)
- Poupore v. Astrue, 566 F.3d 303, 306 (2d Cir. 2009)
- Tirado v. Bowen, 842 F.2d 595, 597 (2d Cir. 1988)
- Williams v. Bowen, 859 F.2d 255, 258 (2d Cir. 1988)
- Brault v. Social Security Administration, Commissioner, 683 F.3d 448, 447-48 (2d Cir. 2012)
- Tejada v. Apfel, 167 F.3d 770, 773 (2d Cir. 1999)
- Biestek v. Berryhill, 587 U.S. 97, 103 (2019)
- Colgan v. Kijakazi, 22 F.4th 353, 359 (2d Cir. 2022)
- Parker-Grose v. Astrue, 462 F. App'x 16, 18 (2d Cir. 2012)
- Wells v. Colvin, 727 F.3d 1061, 1065 & n.3 (10th Cir. 2013)
- MacDonald v. Commissioner of Social Security, No. 17-CV-921, 2019 WL 3067275, at *3 (W.D.N.Y. July 11, 2019)
- Annette A. v. Commissioner of Social Security, No. 23-CV-6087-FPG, 2024 WL 2956906, at *3 (W.D.N.Y. June 12, 2024)
- Ortiz v. Colvin, 298 F. Supp. 3d 581, 591 (W.D.N.Y. 2018)
- Becky S. v. Commissioner of Social Security, No. 22-CV-06321-HKS, 2025 WL 306531, at *8 (W.D.N.Y. Jan. 27, 2025)
- McBrayer v. Secretary of Health & Human Services, 712 F.2d 795, 799 (2d Cir. 1983)
- Curry v. Commissioner of Social Security, 855 F. App'x 46, 48 (2d Cir. 2021)
- Monroe v. Commissioner of Social Security, 676 F. App'x 5, 8 (2d Cir. 2017)
- Cook v. Commissioner of Social Security, 818 F. App'x 108, 109 (2d Cir. 2020)
- Jennifer O. v. Commissioner of Social Security, No. 20-cv-1474, 2022 WL 2718510, at *4 (W.D.N.Y. July 13, 2022)

- *Matta v. Astrue*, 508 F. App'x 53, 56 (2d Cir. 2013)
- *Richard R. v. Commissioner of Social Security*, No. 6:23-CV-6346-LJV, 2024 WL 4064084, at *3-4 (W.D.N.Y. Sept. 5, 2024)
- *Gulczewski v. Commissioner of Social Security*, 464 F. Supp. 3d 490, 497 (W.D.N.Y. 2020)
- *David M. v. Commissioner of Social Security*, No. 21-CV-00230-LJV, 2023 WL 5200160, at *4 (W.D.N.Y. Aug. 14, 2023)
- *Teena H. o/b/o N.I.K. v. Commissioner of Social Security*, 521 F. Supp. 3d 287, 292 (W.D.N.Y. 2021)
- *Cichocki v. Astrue*, 729 F.3d 172, 177 (2d Cir. 2013)
- *Joshua L. v. Commissioner of Social Security*, No. 1:24-CV-00048-MAV, 2025 WL 957551, at *7 (W.D.N.Y. Mar. 31, 2025)
- *Fabian E. v. Commissioner of Social Security*, No. 1:21-CV-187 (JLS), 2023 WL 5843529, at *5 (W.D.N.Y. Sept. 11, 2023)
- *Berry v. Schweiker*, 675 F.2d 464, 469 (2d Cir. 1982)
- *Nicholas F. v. Commissioner of Social Security*, No. 1:21-cv-261-DB, 2023 WL 3901692, at *8 (W.D.N.Y. June 8, 2023)
- *Demeca P. v. Commissioner of Social Security*, No. 1:22-cv-0504, 2024 WL 4505265, at *4 (W.D.N.Y. Oct. 16, 2024)