

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF CALIFORNIA

Bradshaw v. O'Malley

Case No. 24-cv-02490-LJC (N.D. Cal. Sept. 22, 2025) · No. 24-cv-02490-LJC · Decided September 22, 2025

SUMMARY

The United States District Court for the Northern District of California reviews the Commissioner of Social Security’s denial of A.B.’s claim for supplemental security income. The court focuses on the evaluation of A.B.’s left index-finger impairment and related functional limitations, concludes that the administrative decision is not supported by adequate analysis, and reverses and remands for further administrative proceedings. The court declines to award benefits judicially.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Lisa J. Cisneros
JURISDICTION	United States District Court for the Northern District of California
DECIDED	September 22, 2025
DOCKET	24-cv-02490-LJC
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	A.B. sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying supplemental security income benefits. The parties submitted briefs, and the parties consented to magistrate-judge jurisdiction.
STANDARD OF REVIEW	The court reviews the Commissioner's decision for legal error and substantial evidence, considering evidence supporting and detracting from the decision but not substituting its judgment where the evidence reasonably supports either outcome. When an ALJ rejects a claimant's symptom testimony after finding an underlying impairment that could reasonably produce the alleged symptoms and no malingering, the ALJ must provide specific, clear, and convincing reasons.
PRECEDENTIAL VALUE	unpublished district-court order; limited persuasive value
PARTIES	A.B. v. Commissioner of Social Security

TOPICS

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PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ provided legally sufficient reasons for rejecting A.B.'s testimony concerning the pain, weakness, limited motion, and functional effects of her left-index-finger impairment.
2. Whether the record required a judicial award of benefits under the Ninth Circuit's credit-as-true rule rather than remand for further administrative proceedings.
3. Whether the ALJ erred in evaluating Dr. Lewis's fingering opinion, other physical limitations, or psychological opinion evidence; the court did not resolve these issues because they would not alter the need for further proceedings.

HOLDINGS

1. The ALJ erred by failing either to credit A.B.'s testimony regarding her hand impairment or to provide sufficiently specific, clear, and convincing reasons for rejecting it.
2. The court did not rely on the CRPS issue as an independent basis for reversal, but observed that a finding of no Type II CRPS based on a negative nerve study would not preclude Type I CRPS and that the ALJ may have needed to consider whether the record implicated Type I CRPS.
3. The ALJ did not adequately explain why A.B.'s finger-related limitations could be disregarded under the twelve-month durational requirement.
4. The court denied a judicial award of benefits and remanded for further administrative proceedings because the record did not establish disability with the certainty required by the credit-as-true rule.

KEY QUOTATIONS

“General findings are insufficient; rather, the ALJ must identify what testimony is not credible and what evidence undermines the claimant's complaints.” (AR at 29; Analysis § IV.A)

“Improvement does not, on its own, establish any particular level of capacity, and “it is error to reject a claimant’s testimony merely because symptoms wax and wane in the course of treatment.”” (Analysis § IV.A)

“When all three elements of this . . . rule are satisfied, a case raises the ‘rare circumstances’ that allow [a court] to exercise [its] discretion to depart from the ordinary remand rule.” (Analysis § IV.B)

FACTUAL BACKGROUND

A.B. developed pain, swelling, stiffness, and restricted motion in her left index finger beginning in early 2022. She underwent excision of a finger mass in September 2022, but continued to experience pain, stiffness, limited flexion, and difficulty making a fist and performing household and personal tasks. Treatment records

documented improvement in some respects but continued functional limitations through April 2023, and the ALJ assessed an RFC that imposed no specific fingering limitation.

PROCEDURAL HISTORY

The ALJ found that A.B. was not disabled and could perform other work at step five of the sequential evaluation. The district court held that the ALJ failed to provide sufficiently specific and convincing reasons for rejecting A.B.'s testimony regarding her left-index-finger impairment. The court reversed the Commissioner's decision and remanded for further administrative proceedings, denying A.B.'s request for a judicial award of benefits.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remand for further administrative proceedings consistent with the order. The Commissioner should reevaluate A.B.'s testimony concerning her hand impairment, provide legally sufficient reasons if rejecting it, and reconsider related RFC and vocational issues as appropriate. The court also encouraged fuller consideration of the standing-and-walking evidence, attendance-related psychological evidence, possible CRPS issues, ambiguities in Dr. Lewis's report, telephone contact in the vocational hypotheticals, and whether identified jobs exist in significant numbers.

CASES CITED

- Tackett v. Apfel, 180 F.3d 1094, 1098-99 (9th Cir. 1999)
- Maxwell v. Saul, 971 F.3d 1128, 1130 n.2 (9th Cir. 2020)
- Barnhart v. Walton, 535 U.S. 212, 217-22 (2002)
- Roberts v. Shalala, 66 F.3d 179, 182 (9th Cir. 1995)
- Garrison v. Colvin, 759 F.3d 995, 1009-10, 1014-15, 1017, 1020 (9th Cir. 2014)
- Lingenfelter v. Astrue, 504 F.3d 1028, 1035 (9th Cir. 2007)
- Trevizo v. Berryhill, 871 F.3d 664, 678 (9th Cir. 2017)
- Brown-Hunter v. Colvin, 806 F.3d 487, 493 (9th Cir. 2015)
- Reddick v. Chater, 157 F.3d 715, 722 (9th Cir. 1998)
- Tommasetti v. Astrue, 533 F.3d 1035, 1039 (9th Cir. 2008)
- Smolen v. Chater, 80 F.3d 1273, 1284 (9th Cir. 1996)
- Thomas v. Barnhart, 278 F.3d 947, 959 (9th Cir. 2002)
- Wendelin v. Astrue, No. 08-CV-00238-CMA, 2009 WL 723331, at *1 (D. Colo. Mar. 18, 2009), aff'd, 366 F. App'x 899 (10th Cir. 2010)
- Diedrich v. Berryhill, 874 F.3d 634, 638-40 (9th Cir. 2017)
- Celaya v. Halter, 332 F.3d 1177, 1183 (9th Cir. 2003)
- Leon v. Berryhill, 880 F.3d 1041, 1045 (9th Cir. 2017)

- Treichler v. Commissioner of Social Security Administration, 775 F.3d 1090, 1100-01, 1106 (9th Cir. 2014)
- Bray v. Commissioner of Social Security Administration, 554 F.3d 1219, 1228 (9th Cir. 2009)

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