

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Burks v. Commissioner of Social Security

Burks v. Commissioner of Social Security · No. 2:24-CV-2477-DMC BAMAB · Decided August 5, 2025

SUMMARY

The United States District Court for the Eastern District of California reviews a final decision denying Supplemental Security Income benefits on behalf of a minor claimant with a learning disability and ADHD. The court applies the substantial-evidence standard and affirms the Commissioner’s decision, concluding that the ALJ adequately evaluated the claimant’s functional limitations and the medical opinion evidence.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Dennis M. Cota
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	August 5, 2025
DOCKET	2:24-CV-2477-DMC BAMAB
DISPOSITION	affirmed
PROCEDURAL POSTURE	Action for judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying a minor's application for Supplemental Security Income; the parties filed cross-motions for summary judgment.
STANDARD OF REVIEW	The court reviews the Commissioner's final decision for proper legal standards and substantial evidence in the record as a whole. Substantial evidence is more than a mere scintilla but less than a preponderance; where evidence is susceptible to more than one rational interpretation and one interpretation supports the Commissioner's decision, the decision must be affirmed.
PRECEDENTIAL VALUE	Unpublished district court memorandum opinion; precedential status not stated and identified as unknown.
PARTIES	Jenny Ann Burks, on behalf of a minor v. Commissioner of Social Security

TOPICS

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PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

disability benefits

QUESTIONS PRESENTED

1. Whether the ALJ properly evaluated the medical opinion of treating psychologist Dr. Savage under the revised Social Security regulations.
2. Whether the ALJ properly evaluated evidence from the claimant's special education teacher concerning the claimant's limitations in attending and completing tasks.
3. Whether substantial evidence supported the ALJ's finding that the claimant had less-than-marked limitations in acquiring and using information and attending and completing tasks.

HOLDINGS

1. The ALJ adequately evaluated Dr. Savage's opinion under the revised regulations by explaining that the opinion was unpersuasive because it was inconsistent with the objective medical, educational, and other evidence in the record.
2. The ALJ did not err in discounting the special education teacher's statements because the ALJ expressly considered them and provided reasons tied to the record for finding that they overstated the claimant's limitations.
3. Substantial evidence and proper legal analysis supported the Commissioner's conclusion that the claimant was not disabled.

KEY QUOTATIONS

“The Court reviews the Commissioner’s final decision to determine whether it is: (1) based on proper legal standards; and (2) supported by substantial evidence in the record as a whole.” (at 1)

“Given the foregoing evidence of record, the Court finds that substantial evidence supports the limited weight given to Dr. Savage’s opinions that the claimant has marked limitations.” (at 15)

“The ALJ reasonably concluded that the special education teacher’s report did not support an overall finding that the claimant has limitations which “very seriously” affect his ability to attend and complete tasks.” (at 16)

FACTUAL BACKGROUND

The claimant, a minor born in 2007, applied for Supplemental Security Income alleging disability beginning January 1, 2018. The ALJ found learning disability and ADHD to be severe impairments but concluded that they did not meet, medically equal, or functionally equal a listed impairment because the claimant had less-than-

marked limitations in acquiring and using information and attending and completing tasks. The record included special-education services and classroom accommodations, but also evidence of regular-classroom participation, cooperative behavior, generally normal mental-status findings, and only intermittent concentration difficulties.

PROCEDURAL HISTORY

The application for benefits was initially denied and denied again on reconsideration. After an administrative hearing on August 21, 2023, an ALJ issued an unfavorable decision on October 4, 2023. The Appeals Council declined review on July 22, 2024. The district court denied the plaintiff's motion for summary judgment, granted the Commissioner's motion, affirmed the final decision, and directed entry of judgment.

DISPOSITION

affirmed

CASES CITED

- Tackett v. Apfel, 180 F.3d 1094, 1097 (9th Cir. 1999)
- Saelee v. Chater, 94 F.3d 520, 521 (9th Cir. 1996)
- Richardson v. Perales, 402 U.S. 389, 402 (1971)
- Howard v. Heckler, 782 F.2d 1484, 1487 (9th Cir. 1986)
- Jones v. Heckler, 760 F.2d 993, 995 (9th Cir. 1985)
- Hammock v. Bowen, 879 F.2d 498, 501 (9th Cir. 1989)
- Sprague v. Bowen, 812 F.2d 1226, 1229-30 (9th Cir. 1987)
- Thomas v. Barnhart, 278 F.3d 947, 954, 957 (9th Cir. 2002)
- Burkhardt v. Bowen, 856 F.2d 1335, 1338 (9th Cir. 1988)
- Tommasetti v. Astrue, 533 F.3d 1035, 1041 (9th Cir. 2008)
- Garrison v. Colvin, 759 F.3d 995, 1012 (9th Cir. 2014)
- Molina v. Astrue, 674 F.3d 1104, 1111 (9th Cir. 2012)
- Tonapetyan v. Halter, 242 F.3d 1144, 1149 (9th Cir. 2001)
- Turner v. Commissioner of Social Security Administration, 613 F.3d 1217, 1223-24 (9th Cir. 2010)
- Dale v. Colvin, 823 F.3d 941, 943 (9th Cir. 2016)
- Popa v. Berryhill, 872 F.3d 901, 906 (9th Cir. 2017)
- Revels v. Berryhill, 874 F.3d 648, 655 (9th Cir. 2017)
- Jones v. Saul, 2021 WL 620475, at *9 (E.D. Cal. Feb. 17, 2021)
- Carr v. Commissioner of Social Security, 2021 WL 1721692, at *7 (E.D. Cal. Apr. 30, 2021)
- Buethe v. Commissioner of Social Security, 2021 WL 1966202, at *3-*4 (E.D. Cal. May 17, 2021)
- Treichler v. Commissioner, 775 F.3d 1090, 1098 (9th Cir. 2014)