

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA

Dean v. Heckler

613 F. Supp. 318 (W.D. Pa. 1985) · Decided July 18, 1985

SUMMARY

The court reviewed the denial of the plaintiff's application for Supplemental Security Income under the Social Security Act. It held that the Secretary's decision was not supported by substantial evidence because the vocational evidence and the plaintiff's combined medical impairments were inadequately evaluated. The court reversed the Secretary's decision.

CASE DETAILS

COURT	United States District Court for the Western District of Pennsylvania
WRITING FOR THE COURT	Gerald J. Weber
JURISDICTION	Pennsylvania
DECIDED	July 18, 1985
DISPOSITION	reversed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. §§ 1383(c)(3) and 405(g) of the Secretary's denial of Supplemental Security Income. The parties filed cross-motions for summary judgment.
STANDARD OF REVIEW	Whether the Secretary's decision was supported by substantial evidence; the court reviewed the administrative record in resolving the parties' cross-motions for summary judgment.
PRECEDENTIAL VALUE	published and precedential
PARTIES	Dean v. Heckler, Secretary of Health and Human Services

TOPICS

- judicial review of agency action
- administrative law
- summary judgment
- ada / disability
- civil procedure

PRACTICE AREAS

- Social Security disability
- administrative law
- civil procedure

QUESTIONS PRESENTED

1. Whether substantial evidence supported the Secretary's determination that Dean retained the residual functional capacity to perform light work.
2. Whether the ALJ improperly evaluated Dean's medical evidence and subjective complaints by failing to consider his impairments cumulatively and by relying on incomplete or nondiagnostic treadmill tests.
3. Whether the vocational evidence established that Dean could perform other substantial gainful work existing in the national economy.

HOLDINGS

1. The Secretary's decision was not supported by substantial evidence because the only identified light-duty job was eliminated by the vocational expert's later assessment and the medical evidence did not support the residual-functional-capacity finding.
2. The ALJ was required to evaluate Dean's impairments and supporting evidence cumulatively rather than isolating individual findings.

KEY QUOTATIONS

"This evidence should have been considered cumulatively with all other evidence." (613 F. Supp. at 320)

"Accordingly, we do not find substantial evidence to support the Secretary's decision and we will reverse."
(613 F. Supp. at 320)

FACTUAL BACKGROUND

Dean was 54 years old, had an eighth-grade education, and had worked for many years repairing and painting damaged automobiles. He suffered from angina, pulmonary emphysema, chronic back pain from osteoarthritis and degenerative disc disease, low blood pressure, and peptic-ulcer-related abdominal pain. Although the ALJ found that he could not return to his heavy past work, the ALJ concluded that he could perform light work, relying in part on vocational-expert testimony identifying work as an auto-body-repair supervisor. After the hearing, however, the vocational expert reconsidered the limitations identified in the record and stated that Dean could not perform that job, while the medical evidence—including incomplete treadmill tests and the treating physician's opinion—supported greater impairment.

PROCEDURAL HISTORY

Dean applied for Supplemental Security Income in May 1983. The application was denied initially and on reconsideration by the Social Security Administration's Office of Disability Operations. After a hearing, an Administrative Law Judge found that Dean was not disabled because he retained the residual functional capacity for light work. The Appeals Council affirmed in May 1984, making the decision final, and Dean appealed to the district court.

DISPOSITION

reversed

CASES CITED

- Hall v. Secretary of HEW, 602 F.2d 1372 (9th Cir. 1979)

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