

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
WASHINGTON

David A. M. v. Acting Commissioner of Social Security

David A. M. · No. 2:24-cv-01814-TLF · Decided December 29, 2025

SUMMARY

The United States District Court for the Western District of Washington reversed and remanded the Acting Commissioner of Social Security’s denial of Disability Insurance Benefits. The court held that the ALJ did not sufficiently develop the record regarding whether the plaintiff’s past work as an inventory clerk, including light-duty work, required kneeling, crawling, or crouching, which were prohibited by the RFC. On remand, the ALJ was directed to hold another hearing and obtain additional testimony concerning the physical requirements of the past work.

CASE DETAILS

COURT	United States District Court for the Western District of Washington
WRITING FOR THE COURT	Theresa L. Fricke
JURISDICTION	United States District Court for the Western District of Washington
DECIDED	December 29, 2025
DOCKET	2:24-cv-01814-TLF
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the denial of his application for Disability Insurance Benefits. The court reviewed the Administrative Law Judge's decision and the administrative record, reversed the denial, and remanded for further proceedings.
STANDARD OF REVIEW	Under 42 U.S.C. § 405(g), the court may set aside the Commissioner's decision if it is based on harmful legal error or is not supported by substantial evidence in the record as a whole. The court may not reweigh the evidence or substitute its judgment for that of the Commissioner.
PRECEDENTIAL VALUE	Unpublished district court order; precedential status is not identified in the supplied metadata.
PARTIES	David A. M. v. Acting Commissioner of Social Security

TOPICS

judicial review of agency action

agency adjudication

administrative law

civil procedure

PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ adequately developed the factual record and made sufficient findings to determine that plaintiff could perform his past relevant work as an inventory clerk as actually performed despite an RFC completely prohibiting kneeling, crouching, and crawling.
2. Whether the ALJ's step-four finding was supported by substantial evidence.

HOLDINGS

1. The ALJ erred by finding that plaintiff could perform his past inventory clerk work as actually performed without determining whether kneeling, crawling, or crouching were part of the physical requirements of his light-duty work.
2. The ALJ's finding that plaintiff could perform his past relevant work as actually performed was not supported by substantial evidence.

KEY QUOTATIONS

“Substantial evidence is “more than a mere scintilla; it means - and means only - such relevant evidence as a reasonable mind might accept as adequate to support a conclusion.”” (at 1)

“Because plaintiff has identified a discrepancy between his description of his past work and the ALJ's RFC assessment, the Court agrees with plaintiff that ALJ erred in finding that he could perform the job as actually performed.” (at 6)

“On remand, the ALJ is directed to hold another hearing, and solicit additional testimony from plaintiff at step four regarding whether kneeling, crawling, or crouching were part of the physical job requirements for his past relevant work, as actually performed, before making a determination of whether plaintiff is able to perform the inventory clerk past work as actually performed.” (at 7)

FACTUAL BACKGROUND

Plaintiff alleged disability beginning July 9, 2020, based primarily on sequelae of traumatic compartment syndrome in his right leg and posterior tibial tendonitis. The ALJ assessed a residual functional capacity for light work with a complete prohibition on kneeling, crouching, and crawling. Plaintiff described his prior maintenance and inventory-related work as involving physical tasks, and his work-history report stated that he knelt, crouched, and crawled for specified periods each day. The ALJ nevertheless found that plaintiff could perform his past inventory clerk work as actually performed without making findings about whether those activities were required during his light-duty work.

PROCEDURAL HISTORY

Plaintiff filed a Title II application for Disability Insurance Benefits, which was denied initially and on reconsideration. After a January 5, 2024 hearing, the ALJ denied benefits on February 23, 2024, finding at step four that plaintiff could perform his past relevant work as an inventory clerk as actually performed. The district court held that the ALJ did not adequately develop the factual record concerning whether plaintiff's light-duty inventory work required kneeling, crawling, or crouching, and remanded.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The ALJ must hold another hearing and obtain additional testimony from plaintiff concerning whether kneeling, crawling, or crouching were part of the physical requirements of his past relevant work as actually performed before determining whether plaintiff can perform the inventory clerk work. The ALJ may also take additional evidence concerning step five and whether plaintiff can perform other jobs existing in significant numbers in the national economy.

CASES CITED

- Bayliss v. Barnhart, 427 F.3d 1211, 1214 (9th Cir. 2005)
- Biestek v. Berryhill, 139 S. Ct. 1148, 1154 (2019)
- Magallanes v. Bowen, 881 F.2d 747, 750 (9th Cir. 1989)
- Andrews v. Shalala, 53 F.3d 1035, 1039 (9th Cir. 1995)
- Thomas v. Barnhart, 278 F.3d 947, 954 (9th Cir. 2002)
- Barnhart v. Thomas, 540 U.S. 20, 25 (2003)
- Pinto v. Massanari, 249 F.3d 840, 844-45 (9th Cir. 2001)