

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
NEW YORK

Travis H. v. Commissioner of Social Security

5:25-CV-00133 (ML) · No. 5:25-CV-00133 (ML) · Decided March 19, 2026

SUMMARY

The United States District Court for the Northern District of New York reviewed the denial of the plaintiff's Social Security disability benefits. The court granted the plaintiff's motion for judgment on the pleadings, denied the Commissioner's motion, reversed the administrative decision, and remanded the matter under sentence four of 42 U.S.C. § 405(g) for further proceedings. The court held that the ALJ did not adequately evaluate or explain the treatment evidence concerning the plaintiff's mental impairments and residual functional capacity.

CASE DETAILS

COURT	United States District Court for the Northern District of New York
WRITING FOR THE COURT	Miroslav Lovric
JURISDICTION	United States District Court for the Northern District of New York
DECIDED	March 19, 2026
DOCKET	5:25-CV-00133 (ML)
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's denial of Social Security benefits. The parties filed cross-motions for judgment on the pleadings, and the court granted plaintiff's motion, denied the Commissioner's motion, reversed the administrative decision, and remanded for further proceedings.
STANDARD OF REVIEW	The court reviews whether the Commissioner applied the correct legal principles and whether the determination is supported by substantial evidence, defined as relevant evidence that a reasonable mind would find sufficient to support the conclusion. A factual finding may be rejected only if a reasonable factfinder would have to conclude otherwise.
PRECEDENTIAL VALUE	Unpublished district court decision; persuasive authority only within the district and circuit.

PARTIES

Travis H. v. Commissioner of Social Security

TOPICS

judicial review of agency action

agency adjudication

administrative law

remedies

PRACTICE AREAS

Social Security

administrative law

disability benefits

federal civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ adequately evaluated plaintiff's VA mental-health treatment records when assessing the paragraph B criteria at step three of the sequential evaluation.
2. Whether the ALJ adequately explained the evidentiary basis for plaintiff's residual functional capacity determination.
3. Whether the Commissioner's decision was supported by substantial evidence and could be affirmed on the basis of post-hoc rationalizations offered in litigation.

HOLDINGS

1. The ALJ's evaluation of plaintiff's mental-health treatment records was inadequate because the paragraph B analysis relied almost exclusively on a single consultative examination despite extensive longitudinal VA treatment records and failed to explain the significance of the contrary evidence.
2. An ALJ must discuss evidence and factors crucial to the disability determination with sufficient specificity to permit meaningful judicial review and must build an accurate and logical bridge from the evidence to the conclusions.
3. The court may not affirm the Commissioner's decision based solely on post-hoc rationalizations supplied in the Commissioner's litigation brief rather than reasons stated by the ALJ.

KEY QUOTATIONS

"The Court must determine whether correct legal principles were applied and whether the determination is supported by substantial evidence, which is defined as such relevant evidence as a reasonable mind would find sufficient to support a conclusion." (Transcript at 5)

"ALJs must discuss the evidence and factors "crucial" to the disability determination with "sufficient specificity to enable [this Court] to decide whether the determination is supported by substantial evidence."" (Transcript at 7)

"Put another way, an ALJ must "build an accurate and logical bridge" from the evidence to her conclusion to enable a meaningful review." (Transcript at 7)

"This Court may not affirm the ALJ's decision solely on those post-hoc rationalizations." (Transcript at 10)

FACTUAL BACKGROUND

Plaintiff, a former Marine and police officer, alleged disability based on PTSD, depressive disorder, lumbar spine impairment, knee injuries, tinnitus, asthma, traumatic brain injury, and hearing loss. He received ongoing psychiatric treatment through the Department of Veterans Affairs and was hospitalized for four days in October 2022 after expressing suicidal ideation. The ALJ found severe lumbar, knee, PTSD, and depressive impairments but concluded that plaintiff retained the capacity for a restricted range of medium work and could perform jobs existing in significant numbers in the national economy.

PROCEDURAL HISTORY

Plaintiff applied for Title II benefits on July 3, 2022, alleging disability beginning February 1, 2022. Administrative Law Judge Mary Jane Pelton denied the claim on February 23, 2024, and the Appeals Council denied review on December 12, 2024, making the ALJ's decision the Commissioner's final decision. Plaintiff commenced this action on January 29, 2025. After oral argument on March 19, 2026, the court remanded under sentence four of 42 U.S.C. § 405(g).

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remand to the Commissioner for further administrative proceedings consistent with the opinion and oral bench decision, including adequate evaluation and explanation of plaintiff's mental-health treatment records, the paragraph B listing criteria, and the functional limitations in the RFC. The remand did not include a directed finding of disability.

CASES CITED

- Brault v. Social Security Administration Commissioner, 683 F.3d 443 (2d Cir. 2012)
- Estrella v. Berryhill, 925 F.3d 90, 98 (2d Cir. 2019)
- Sheenalee D. v. Commissioner of Social Security, 8:19-CV-140, 2020 WL 1034396, at *5 (N.D.N.Y. Feb. 3, 2020)
- Sheenalee D. v. Commissioner of Social Security, 2020 WL 1030652 (N.D.N.Y. Mar. 3, 2020)
- Rick Paul B. v. Commissioner of Social Security, 5:23-CV-1261, 2025 WL 347642, at *6 (N.D.N.Y. Jan. 10, 2025)