

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
WASHINGTON

Luana Marie H. v. Commissioner of Social Security Administration

No. 1:25-CV-03138-SAB (E.D. Wash. Jan. 15, 2026) · No. 1:25-CV-03138-SAB · Decided January 16, 2026

SUMMARY

The United States District Court for the Eastern District of Washington reviewed the Commissioner of Social Security’s denial of Luana Marie H.’s applications for disability insurance benefits and supplemental security income. The court held that the administrative law judge’s residual functional capacity assessment failed to account for documented mental-health limitations and improperly evaluated medical-opinion and symptom evidence. The court reversed the Commissioner’s decision and remanded for an immediate award of benefits.

CASE DETAILS

COURT	United States District Court for the Eastern District of Washington
WRITING FOR THE COURT	Stanley A. Bastian
JURISDICTION	United States District Court for the Eastern District of Washington
DECIDED	January 16, 2026
DOCKET	1:25-CV-03138-SAB
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying disability insurance benefits and supplemental security income. The district court reviewed the administrative record and the parties' briefs, reversed the Commissioner's decision, and remanded for an immediate award of benefits.
STANDARD OF REVIEW	The court sets aside the Commissioner's determination only for legal error or lack of substantial evidence in the record as a whole. Substantial evidence is more than a mere scintilla but less than a preponderance and is such relevant evidence as a reasonable mind might accept as adequate. The court must consider the entire record, including evidence supporting and detracting from the Commissioner's conclusion, and may not affirm by isolating a specific quantum of supporting evidence.

PRECEDENTIAL VALUE	unknown
PARTIES	Luana Marie H. v. Commissioner of Social Security Administration

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's RFC determination was supported by substantial evidence and adequately incorporated Plaintiff's documented limitations in concentration, persistence, pace, self-management, attendance, maintaining a normal workday or workweek, and responding to criticism from supervisors.
2. Whether the ALJ properly evaluated the persuasiveness of Dr. Morgan's medical opinion under 20 C.F.R. § 416.920c.
3. Whether remand for an immediate award of benefits, rather than further administrative proceedings, was appropriate.

HOLDINGS

1. The ALJ's RFC determination was not supported by substantial evidence because it failed to account for limitations documented in the record, including moderate limitations in concentration, persistence, pace, and managing oneself, as well as additional limitations identified by the medical expert.
2. The ALJ erred in finding Dr. Morgan's opinion unpersuasive because the conclusion that Dr. Morgan's examination findings were essentially normal was not supported by substantial evidence, and Dr. Morgan's opinions were supported and consistent with the record.
3. Remand for an immediate award of benefits was appropriate because, if Plaintiff's limitations were properly included in the RFC, the ALJ would have to find that Plaintiff was disabled, and further administrative proceedings were unnecessary.

KEY QUOTATIONS

“The Commissioner’s determination will be set aside only when the ALJ’s findings are based on legal error or are not supported by substantial evidence in the record as a whole.” (at 3)

“Substantial evidence is “more than a mere scintilla,” Richardson v. Perales, 402 U.S. 389, 401 (1971), but “less than a preponderance,” Sorenson v. Weinberger, 514 F.2d 1112, 1119 n.10 (9th Cir. 1975).” (at 3)

“The ALJ was not permitted to “cherry-pick” from those mixed results to support a denial of benefits.... The very nature of bipolar disorder is that people with the disease experience fluctuations in their symptoms, so

any single notation that a patient is feeling better or has had a ‘good day’ does not imply that the condition has been treated.” (at 8)

“If an ALJ’s hypothetical does not reflect all of the claimant’s limitations, then the expert’s testimony has no evidentiary value to support a finding that the claimant can perform jobs in the national economy.” (at 9)

FACTUAL BACKGROUND

Plaintiff, age 35 at the hearing, had not completed high school and had prior work as a caregiver. She alleged disabling bipolar disorder, depression, generalized anxiety with agoraphobia, and panic disorder, describing significant mood cycles, panic attacks, inability to leave home or enter stores without support, and periods when she could not get out of bed or care for herself. The ALJ found these impairments severe but assessed an RFC for simple and repetitive work with limited interaction and no fast-paced assembly-line work, relying in part on an adverse assessment of Dr. Morgan's opinion and Plaintiff's subjective statements.

PROCEDURAL HISTORY

Plaintiff applied for disability insurance benefits and supplemental security income. The applications were denied initially and on reconsideration; following telephonic hearings on June 26, 2023, and April 5, 2024, an ALJ found Plaintiff not disabled. The Appeals Council denied review on June 25, 2025, making the ALJ's decision final. Plaintiff filed this action on August 22, 2025.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The matter is remanded to the Commissioner for an immediate award of benefits. Judgment shall be entered for Plaintiff and against the Commissioner, and the file shall be closed.

CASES CITED

- *Keyes v. Sullivan*, 894 F.2d 1053, 1057 (9th Cir. 1990)
- *Tackett v. Apfel*, 108 F.3d 1094, 1098 (9th Cir. 1999)
- *Matney v. Sullivan*, 981 F.2d 1016, 1018 (9th Cir. 1992)
- *Richardson v. Perales*, 402 U.S. 389, 401 (1971)
- *Sorenson v. Weinberger*, 514 F.2d 1112, 1119 n.10 (9th Cir. 1975)
- *Browner v. Secretary of Health & Human Services*, 839 F.2d 432, 433 (9th Cir. 1988)
- *Stout v. Commissioner, Social Security Administration*, 454 F.3d 1050, 1055 (9th Cir. 2006)
- *Batson v. Barnhart*, 359 F.3d 1190, 1193 (9th Cir. 2004)
- *Revels v. Berryhill*, 874 F.3d 648, 654 (9th Cir. 2017)
- *Garrison v. Colvin*, 759 F.3d 995, 1018 n.23 (9th Cir. 2014)
- *Bray v. Commissioner of Social Security Administration*, 554 F.3d 1219, 1228 (9th Cir. 2009)

- *Garrison v. Colvin*, 759 F.3d 995, 1021 (9th Cir. 2014)

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