UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF KENTUCKY, NORTHERN DIVISION AT ASHLAND

Morris W. Blair, Jr. v. Commissioner of Social Security

Civil Action No. 24-116-DLB (E.D. Ky. Mar. 24, 2026) · No. Civil Action No. 24-116-DLB · Decided March 24, 2026

SUMMARY

The United States District Court for the Eastern District of Kentucky affirmed the Commissioner's denial of Morris W. Blair, Jr.'s applications for disability insurance benefits and supplemental security income. The court held that the Administrative Law Judge's decision, including the residual functional capacity assessment and treatment of mild mental limitations, was supported by substantial evidence. Plaintiff's motion for summary judgment was overruled, and the Commissioner's motion was sustained.

CASE DETAILS

COURT	United States District Court for the Eastern District of Kentucky, Northern Division at Ashland
WRITING FOR THE COURT	David L. Bunning
JURISDICTION	United States District Court for the Eastern District of Kentucky, Northern Division at Ashland
DECIDED	March 24, 2026
DOCKET	Civil Action No. 24-116-DLB
DISPOSITION	affirmed
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 benefits. The parties filed cross-motions for summary judgment.
STANDARD OF REVIEW	The court reviewed whether the Commissioner's decision was supported by substantial evidence on the record as a whole. It could not try the case de novo, resolve evidentiary conflicts, reweigh the evidence, or decide credibility questions.
PRECEDENTIAL VALUE	Unpublished district-court memorandum opinion; precedential status is unknown in the source metadata.

PARTIES	Morris W. Blair, Jr. v. Commissioner of Social Security

TOPICS

judicial review of agency action | administrative law | disability definition

PRACTICE AREAS

Social Security disability | administrative law | judicial review of agency action

QUESTIONS PRESENTED

1. Whether substantial evidence supported the Commissioner's final decision finding Plaintiff not disabled.
2. Whether the ALJ erred by failing to include specific mental limitations in the residual functional capacity assessment after finding mild mental limitations at step two.

HOLDINGS

1. The Commissioner's decision denying benefits was supported by substantial evidence and was affirmed.
2. The ALJ did not err by failing to include specific mental restrictions in the RFC because an ALJ is not required to discuss or incorporate every non-severe impairment into the RFC assessment, and the record independently supported the conclusion that Plaintiff's mild mental limitations did not prevent performance of his past relevant work.

KEY QUOTATIONS

> *"The court may not try the case de novo nor resolve conflicts in evidence, nor decide questions of credibility."* (at 3)

> *"there is no [ ] requirement that the RFC must include restrictions reflecting a non-severe condition in the RFC."* (at 4)

> *"There is simply nothing in the record to suggest any more mental limitation than was noted by the ALJ."* (at 5)

FACTUAL BACKGROUND

Plaintiff alleged disability beginning September 23, 2021, based principally on HIV/AIDS, peripheral neuropathy, depression, and high blood pressure. The ALJ found severe impairments consisting of HIV, peripheral autonomic neuropathy, chronic kidney disease, and mild degenerative joint disease of the right wrist, but found no listed impairment and determined that Plaintiff retained the residual functional capacity for restricted light work. Plaintiff was 57 years old, had a college education, and had past relevant work as a banquet manager and golf club manager. The ALJ found that Plaintiff could return to his past relevant work, while the district court found substantial evidence supporting the decision despite Plaintiff's contention that the RFC omitted mental limitations.

PROCEDURAL HISTORY

Plaintiff applied for disability insurance benefits and supplemental security income benefits, alleging disability from HIV/AIDS, neuropathy, depression, and high blood pressure. The application was denied initially and on reconsideration. Following a telephonic hearing, the ALJ found Plaintiff not disabled at step four because he could perform his past relevant work. The Appeals Council denied review, making the ALJ's decision the Commissioner's final decision. The district court affirmed the Commissioner's decision, overruled Plaintiff's motion for summary judgment, and sustained the Commissioner's motion.

DISPOSITION

affirmed

CASES CITED

- Garner v. Heckler, 745 F.2d 383, 387 (6th Cir. 1984)
- Kirk v. Secretary of Health and Human Services, 667 F.2d 524, 535 (6th Cir. 1981), cert. denied, 461 U.S. 957 (1983)
- Bradley v. Secretary of Health and Human Services, 862 F.2d 1224, 1228 (6th Cir. 1988)
- Key v. Callahan, 109 F.3d 270, 273 (6th Cir. 1997)
- Emard v. Commissioner of Social Security, 953 F.3d 844, 851-52 (6th Cir. 2020)
- Lennon v. Commissioner of Social Security, No. 2:21-cv-12942, 2023 WL 2733382, at *6 (E.D. Mich. Mar. 31, 2023)
- Plotkowski v. Commissioner of Social Security, No. 2:20-cv-12011, 2022 WL 413371, at *6 (E.D. Mich. Jan. 18, 2022)
- Shamsud-Din v. Commissioner of Social Security, No. 16-cv-11818, 2017 WL 3574694, at *6 (E.D. Mich. July 24, 2017)
- Phillips v. Commissioner of Social Security, No. 3:22-cv-01144, 2023 WL 4078204, at *6 (N.D. Ohio Apr. 4, 2023)
- Longworth v. Commissioner of Social Security, 402 F.3d 591, 595 (6th Cir. 2005)

Retrieved from lawtools.ai · https://lawtools.ai/cases/state/united-states-district-court-for-the-eastern-district-of-kentucky-northern-division-at-ashland-unite/2026/morris-w-blair-jr-v-commissioner-of-social-security-f9kfr2gw