

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
CALIFORNIA

James L. v. SSA Commissioner

No. 25-cv-00503-TSH (N.D. Cal. Oct. 14, 2025) · No. 25-cv-00503-TSH · Decided October 14, 2025

SUMMARY

The United States District Court for the Northern District of California reviews the Commissioner of Social Security’s denial of James L.’s claim for disability insurance benefits. The court grants Plaintiff’s motion for summary judgment and denies Defendant’s cross-motion, holding that the ALJ failed to provide clear and convincing reasons for discounting Plaintiff’s allegations of upper-extremity dysfunction. The court also considers the ALJ’s treatment of nonsevere anxiety-related limitations and Plaintiff’s ability to perform past relevant work as a computer programmer.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Thomas S. Hixson
JURISDICTION	United States District Court for the Northern District of California
DECIDED	October 14, 2025
DOCKET	25-cv-00503-TSH
DISPOSITION	remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's denial of disability insurance benefits. The parties filed cross-motions for summary judgment.
STANDARD OF REVIEW	The court reviews the Commissioner's decision under 42 U.S.C. § 405(g) and may disturb it only if it is unsupported by substantial evidence or based on improper legal standards. The court must consider the entire administrative record, including evidence supporting and detracting from the decision, and may not affirm by isolating a specific quantum of supporting evidence. Legal error requires remand unless the agency's path can reasonably be discerned and the error is harmless; the reviewing court may not make independent findings or supply reasons not asserted by the ALJ.
PRECEDENTIAL VALUE	unpublished district court opinion

PARTIES

James L. v. SSA Commissioner

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether the ALJ provided specific, clear, and convincing reasons for discounting Plaintiff's subjective allegations concerning upper-extremity dysfunction.
2. Whether the ALJ properly incorporated Plaintiff's mild limitations from a non-severe anxiety disorder into the residual functional capacity assessment.
3. Whether the ALJ properly determined that Plaintiff could perform his past relevant work as a computer programmer in light of the alleged fine-manipulation limitations.
4. Whether the proper remedy was an immediate award of benefits or remand for further administrative proceedings.

HOLDINGS

1. The ALJ failed to provide specific, clear, and convincing reasons for rejecting Plaintiff's allegations of upper-extremity dysfunction.
2. The ALJ did not commit reversible error in determining Plaintiff's residual functional capacity without imposing additional mental work restrictions for his non-severe anxiety disorder.
3. The ALJ's determination that Plaintiff could perform his past relevant work as a computer programmer could not stand because it was potentially affected by the inadequate evaluation of Plaintiff's upper-extremity allegations.
4. Remand for further administrative proceedings, rather than an immediate award of benefits, was appropriate.

KEY QUOTATIONS

"Where, as here, objective medical evidence in the record established underlying physical impairments that could reasonably be expected to produce Plaintiff's reported upper extremity dysfunction, the ALJ could only reject those symptom allegations by offering "specific, clear and convincing reasons" for doing so." (V.B.2)

"However, none of these activities show how Plaintiff can type or engage in fine manipulation for more than 10 minutes at a time without taking a break." (V.B.2)

“Here, the ALJ failed to fully and fairly develop the record when evaluating Plaintiff’s disability claim, but it is not clear that the ALJ would be required to find Plaintiff disabled.” (V.E)

FACTUAL BACKGROUND

Plaintiff alleged that upper-extremity shaking, fatigue, weakness, numbness, and cramping prevented him from typing or using a computer for more than ten minutes without a fifteen- to twenty-minute break. The record included bilateral carpal tunnel and cubital tunnel syndromes, prior surgeries on both arms, cervical spine spondylosis with a disc protrusion and severe foraminal narrowing, diminished sensation, tremors, and a history of Guillain-Barre Syndrome. The ALJ found that Plaintiff could perform light work with frequent fingering and handling, and determined that he could perform his past work as a computer programmer. The district court concluded that the ALJ did not adequately evaluate the medical evidence and Plaintiff’s activities in assessing the alleged upper-extremity limitations.

PROCEDURAL HISTORY

Plaintiff applied for Title II disability insurance benefits on October 25, 2022, alleging disability beginning September 2, 2021. The claim was denied initially and on reconsideration; following a December 14, 2023 hearing, the ALJ issued an unfavorable decision on January 31, 2024. The Appeals Council denied review on November 21, 2024. The district court granted Plaintiff’s motion for summary judgment, denied the Commissioner’s cross-motion, and remanded for further administrative proceedings.

DISPOSITION

remanded

REMAND INSTRUCTIONS

Remand for further administrative proceedings consistent with the order, including reevaluation of Plaintiff’s subjective upper-extremity symptom allegations and the related RFC and past-relevant-work determinations.

CASES CITED

- Brown-Hunter v. Colvin, 806 F.3d 487, 492 (9th Cir. 2015)
- Biestek v. Berryhill, 587 U.S. 97, 102-103 (2019)
- Garrison v. Colvin, 759 F.3d 995, 1009-1010, 1014-1016 (9th Cir. 2014)
- Hill v. Astrue, 698 F.3d 1153, 1159 (9th Cir. 2012)
- Ford v. Saul, 950 F.3d 1141, 1148-1149 (9th Cir. 2020)
- Sullivan v. Zebley, 493 U.S. 521, 530 (1990)
- Thomas v. Barnhart, 278 F.3d 947, 955 (9th Cir. 2002)
- Lounsbury v. Barnhart, 468 F.3d 1111, 1114-1115 (9th Cir. 2006)
- Tackett v. Apfel, 180 F.3d 1094, 1097-1098, 1101 (9th Cir. 1999)
- Wischmann v. Kijakazi, 68 F.4th 498, 502 (9th Cir. 2023)
- Pinto v. Massanari

- Berry v. Astrue, 622 F.3d 1228, 1234 (9th Cir. 2010)
- Smith v. Kijakazi, 14 F.4th 1108, 1113 (9th Cir. 2021)
- Lambert v. Saul, 980 F.3d 1266, 1268 (9th Cir. 2020)
- Ghanim v. Colvin, 763 F.3d 1154, 1164 (9th Cir. 2014)
- Williams v. Colvin, 2015 WL 4507174, at *6 (C.D. Cal. July 23, 2015)
- Holohan v. Massanari, 246 F.3d 1195, 1207 (9th Cir. 2001)
- Sousa v. Callahan, 143 F.3d 1240, 1243 (9th Cir. 1998)
- Reddick v. Chater, 157 F.3d 715, 722 (9th Cir. 1998)
- Laborin v. Berryhill, 867 F.3d 1151, 1153 (9th Cir. 2017)
- Carmickle v. Commissioner of Social Security, 533 F.3d 1155, 1164 (9th Cir. 2008)
- Hutton v. Astrue, 491 F. App'x 850, 850-851 (9th Cir. 2012)
- Kari P. v. Saul, 2020 WL 6889202, at *8 (S.D. Cal. Nov. 23, 2020)
- Rounds v. Commissioner of Social Security Administration, 807 F.3d 996, 1006 (9th Cir. 2015)
- Stubbs-Danielson v. Astrue, 539 F.3d 1169, 1174 (9th Cir. 2008)
- Benecke v. Barnhart, 379 F.3d 587, 595 (9th Cir. 2004)
- Luther v. Berryhill, 891 F.3d 872, 877-878 (9th Cir. 2018)
- Leon v. Berryhill, 880 F.3d 1041, 1047 (9th Cir. 2017)

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