

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
OHIO, EASTERN DIVISION

Justina Hurst o/b/o G.J.D.A. v. Commissioner of Social Security

Hurst · No. 5:25-cv-1244 · Decided February 9, 2026

SUMMARY

This Report and Recommendation concerns judicial review of the Commissioner of Social Security’s denial of supplemental security income benefits to a minor claimant. The magistrate judge recommends affirming the Commissioner’s decision, concluding that the ALJ properly evaluated the consultative examiner’s opinion and that the claimant’s impairments did not meet, medically equal, or functionally equal a listed impairment.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio, Eastern Division
WRITING FOR THE COURT	James E. Grimes Jr.
JURISDICTION	United States District Court for the Northern District of Ohio, Eastern Division
DECIDED	February 9, 2026
DOCKET	5:25-cv-1244
DISPOSITION	other
PROCEDURAL POSTURE	Report and Recommendation on a complaint seeking judicial review of the Commissioner of Social Security's denial of supplemental security income benefits for a minor claimant.
STANDARD OF REVIEW	The court reviews the Commissioner's decision to determine whether the ALJ applied the correct legal standards and whether the findings are supported by substantial evidence. The court may not try the case de novo, resolve evidentiary conflicts, or decide credibility, and must affirm when substantial evidence supports the ALJ's conclusion.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Justina Hurst o/b/o G.J.D.A. v. Commissioner of Social Security

TOPICS

judicial review of agency action

agency adjudication

administrative law

disability definition

PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ adequately articulated consideration of the supportability and consistency factors when evaluating Dr. Johnson-Brown's consultative medical opinion.
2. Whether the ALJ was required to discuss the medical-opinion evidence in a particular order or in a separate section of the decision.

HOLDINGS

1. The ALJ satisfied the regulatory articulation requirement because, although he did not use the words "supportability" and "consistency," he discussed the opinion's examination findings and subjective reports and compared them with treatment notes, school records, and other evidence.
2. The ALJ was not required to discuss opinion evidence in a particular order or in a separate section; the decision may be evaluated as a whole.

KEY QUOTATIONS

"In sum, a review of the ALJ's evaluation, illustrates that he considered the supportability and consistency of Dr. Johnson-Brown's opinion as required—albeit without using the magic words." (Tr. 25)

"When read as a whole, the ALJ discussed the supportability and consistency of Dr. Johnson-Brown's opinion. Hurst's sole argument, thus, does not provide a basis for remand." (Tr. 25)

FACTUAL BACKGROUND

G.J.D.A., a minor, was alleged to be disabled based on ADHD, bipolar disorder, anxiety, sensory processing disorder, oppositional defiant disorder, autism spectrum disorder, and related behavioral and functional difficulties. The ALJ found severe impairments but determined that they did not meet, medically equal, or functionally equal a listed impairment. The judicial-review dispute focused on whether the ALJ adequately evaluated the supportability and consistency of consultative examiner Dr. Johnson-Brown's medical opinion.

PROCEDURAL HISTORY

Hurst applied for supplemental security income on behalf of G.J.D.A. The application was denied initially and on reconsideration. After a telephonic hearing, the ALJ determined that G.J.D.A. was not disabled, and the Appeals Council denied review. The matter was referred to a magistrate judge, who recommended affirming the Commissioner's final decision.

DISPOSITION

other

CASES CITED

- McClanahan v. Commissioner of Social Security, 193 F. App'x 422, 425 (6th Cir. 2006)
- Smoot v. Commissioner of Social Security, 2023 WL 1413097, at *12 (N.D. Ohio Jan. 31, 2023)
- M.G. v. Commissioner of Social Security, 861 F. Supp. 2d 846, 855 (E.D. Mich. 2012)
- Woodall v. Colvin, 2013 WL 4710516, at *10 (N.D. Ohio Aug. 29, 2013)
- Tate ex rel. Tate v. Commissioner of Social Security, 368 F. Supp. 2d 661, 663 (E.D. Mich. 2005)
- Jordan v. Commissioner of Social Security, 548 F.3d 417, 422 (6th Cir. 2008)
- Biestek v. Berryhill, 587 U.S. 97, 99, 102-03 (2019)
- Bass v. McMahon, 499 F.3d 506, 509 (6th Cir. 2007)
- Jones v. Commissioner of Social Security, 336 F.3d 469, 477 (6th Cir. 2003)
- Lindsley v. Commissioner of Social Security, 560 F.3d 601, 605 (6th Cir. 2009)
- Felisky v. Bowen, 35 F.3d 1027, 1035 (6th Cir. 1994)
- Cormany v. Kijakazi, 2022 WL 4115232, at *3 (N.D. Ohio Sept. 9, 2022)
- Toennies v. Commissioner of Social Security, 2020 WL 2841379, at *14 (N.D. Ohio June 1, 2020)
- Chicora v. Commissioner of Social Security, 852 F. App'x 968, 969-70 (6th Cir. 2021)
- Crum v. Commissioner of Social Security, 660 F. App'x 449, 456-57 (6th Cir. 2016)
- Kraig v. Kijakazi, 2022 WL 4232692, at *8-9 (N.D. Ohio Sept. 14, 2022)
- Berkshire v. Beauvais, 928 F.3d 520, 530-31 (6th Cir. 2019)