

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
WASHINGTON

Linda D. v. Frank Bisignano, Commissioner of Social Security

Linda D. · No. 1:24-CV-03073-LRS · Decided March 19, 2026

SUMMARY

The United States District Court for the Eastern District of Washington reversed the Commissioner of Social Security’s decision denying supplemental security income benefits before September 9, 2023. The court held that the ALJ inadequately evaluated medical opinions, symptom statements, lay witness statements, and physical impairments. The case was remanded for further administrative proceedings before a different ALJ, rather than for an immediate award of benefits.

CASE DETAILS

COURT	United States District Court for the Eastern District of Washington
WRITING FOR THE COURT	Lonny R. Suko
JURISDICTION	United States District Court for the Eastern District of Washington
DECIDED	March 19, 2026
DOCKET	1:24-CV-03073-LRS
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 1383(c)(3) of the Commissioner's decision finding her disabled beginning September 9, 2023, but not disabled before that date. The Commissioner conceded legal error and requested remand for further administrative proceedings. Plaintiff requested remand for an award of benefits.
STANDARD OF REVIEW	Under 42 U.S.C. § 405(g), the court reviews the Commissioner's decision for substantial evidence and legal error, considering the entire record and declining to substitute its judgment for that of the Commissioner. An error is harmless if it is inconsequential to the ultimate nondisability determination.
PRECEDENTIAL VALUE	unpublished
PARTIES	Linda D. v. Frank Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

remedies

civil procedure

PRACTICE AREAS

Social Security disability

administrative law

federal judicial review

QUESTIONS PRESENTED

1. Whether the ALJ properly evaluated the medical opinions and prior administrative medical findings for the period before September 9, 2023.
2. Whether the ALJ properly evaluated Plaintiff's symptom statements for the period before September 9, 2023.
3. Whether the ALJ properly evaluated the lay witness statements for the period before September 9, 2023.
4. Whether the ALJ properly evaluated Plaintiff's physical impairments and symptoms.
5. Whether the case should be remanded for an immediate award of benefits or for further administrative proceedings.

HOLDINGS

1. The ALJ committed reversible legal error by failing to adequately address the supportability factor for the medical opinions and prior administrative medical findings, including the opinions of Drs. Billings, Genthe, Harrison, and Gardner.
2. The ALJ's evaluation of Plaintiff's subjective symptom statements required reconsideration on remand because it relied in part on an assessment of the medical evidence that was affected by the errors in evaluating the medical opinions.
3. The ALJ must reconsider the six lay witness statements on remand.
4. On remand, the ALJ must revisit the evaluation of Plaintiff's physical symptoms and evidence.
5. Remand for further administrative proceedings, rather than an immediate award of benefits, was appropriate.

KEY QUOTATIONS

"the Commissioner's decision will be disturbed "only if it is not supported by substantial evidence or is based on legal error." (at 1)

"When a district court reverses the decision of the Commissioner of Social Security, "the proper course, except in rare circumstances, is to remand to the agency for additional investigation or explanation." (at 1)

"The ALJ is required to explain how supportability and consistency are considered." (at 3)

FACTUAL BACKGROUND

Linda D. alleged disability beginning December 1, 2018, based primarily on intellectual and mental-health impairments, including bipolar disorder, PTSD, ADHD, anxiety, and depression, as well as physical symptoms

involving swelling, numbness, and pain in her hands and feet. She had limited education and prior work sorting and packing fruit. The ALJ found severe intellectual and mental impairments but determined that Plaintiff was not disabled before September 9, 2023, while finding her disabled on and after that date.

PROCEDURAL HISTORY

Plaintiff applied for supplemental security income in December 2018. After an unfavorable ALJ decision and Appeals Council denial, the case was previously remanded by the district court in March 2022. Following a second hearing, the ALJ found Plaintiff disabled as of September 9, 2023, but not before that date. The district court reversed and remanded under sentence four of 42 U.S.C. § 405(g), directing further proceedings before a different ALJ and denying Plaintiff's request for an immediate award of benefits.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The case is remanded under sentence four of 42 U.S.C. § 405(g). A different ALJ must reconsider the period before September 9, 2023; reconsider the medical opinions, prior administrative medical findings, lay evidence, symptom evidence, and physical evidence; apply 20 C.F.R. § 416.920c; allow Plaintiff to submit additional evidence; further develop the record as necessary; and issue a new decision.

CASES CITED

- Hill v. Astrue, 698 F.3d 1153, 1158-59 (9th Cir. 2012)
- Edlund v. Massanari, 253 F.3d 1152, 1156 (9th Cir. 2001)
- Molina v. Astrue, 674 F.3d 1104, 1111, 1115 (9th Cir. 2012)
- Shinseki v. Sanders, 556 U.S. 396, 409-10 (2009)
- Tackett v. Apfel, 180 F.3d 1094, 1098 (9th Cir. 1999)
- Beltran v. Astrue, 700 F.3d 386, 389 (9th Cir. 2012)
- Garrison v. Colvin, 759 F.3d 995, 1019 (9th Cir. 2014)
- Dominguez v. Colvin, 808 F.3d 403, 407 (9th Cir. 2015)
- Florida Power & Light Co. v. Lorion, 470 U.S. 729, 744 (1985)
- Treichler v. Comm'r of Soc. Sec. Admin., 775 F.3d 1090, 1099-1100, 1103-04 (9th Cir. 2014)
- Leon v. Berryhill, 880 F.3d 1041, 1045 (9th Cir. 2017)
- Woods v. Kijakazi, 32 F.4th 785, 792 (9th Cir. 2022)