

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
WASHINGTON

Jeffery C. v. Commissioner of Social Security

Jeffery C. · No. 2:25-CV-1358-DWC · Decided January 7, 2026

SUMMARY

The United States District Court for the Western District of Washington affirmed the Commissioner of Social Security’s denial of the plaintiff’s applications for Supplemental Security Income and Disability Insurance Benefits. The court upheld the Administrative Law Judge’s evaluation of medical opinions from Dr. Carl Epp and ARNP Manisha Ramdev, as well as the statement from the plaintiff’s fiancée. The court concluded that the ALJ’s findings were supported by substantial evidence and that any remaining errors were harmless.

CASE DETAILS

COURT	United States District Court for the Western District of Washington
WRITING FOR THE COURT	David W. Christel
JURISDICTION	United States District Court for the Western District of Washington
DECIDED	January 7, 2026
DOCKET	2:25-CV-1358-DWC
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying his applications for Supplemental Security Income and Disability Insurance Benefits.
STANDARD OF REVIEW	Under 42 U.S.C. § 405(g), the court may set aside the Commissioner's denial of benefits only if the ALJ's findings are based on legal error or are not supported by substantial evidence in the record as a whole.
PRECEDENTIAL VALUE	unknown
PARTIES	Jeffery C. v. Commissioner of Social Security

TOPICS

- judicial review of agency action
- administrative law
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the ALJ properly evaluated consultative examiner Carl Epp's statements concerning Plaintiff's ability to work, social functioning, and memory.
2. Whether the ALJ properly evaluated consulting examiner Manisha Ramdev's medical opinion concerning Plaintiff's physical limitations.
3. Whether the ALJ provided germane reasons for rejecting Plaintiff's fiancée's lay-witness statements.
4. Whether any remaining errors in the ALJ's evaluation of the evidence were harmless.

HOLDINGS

1. The ALJ was not required to address Dr. Epp's statement that Plaintiff was unable to work because that statement concerned an issue reserved to the Commissioner. To the extent Dr. Epp opined that Plaintiff's social abilities were uncertain, the ALJ properly rejected the statement because it did not identify a specific limitation. The ALJ also properly rejected the asserted marked memory impairment as unsupported and inconsistent with the record.
2. The ALJ reasonably found ARNP Ramdev's opinion unpersuasive because it was inadequately explained, relied on findings or diagnoses unsupported by the record, assumed that Plaintiff medically required a cane, and conflicted with evidence of Plaintiff's construction and home-building activities.
3. The ALJ provided germane reasons for rejecting Plaintiff's fiancée's statements, including their inconsistency with Plaintiff's construction and home-building activities. Any error concerning observations about social activity and stress was harmless because the observations were duplicative of properly discounted testimony and did not establish a severe mental impairment.
4. The court found no reversible legal error and concluded that the ALJ's findings were supported by substantial evidence; therefore, the Commissioner's decision denying benefits was affirmed.

KEY QUOTATIONS

"After considering the record, the Court finds no reversible error and affirms the Commissioner's decision to deny benefits." (at 1)

"However, statements that a claimant is disabled or unable to work are statements on issues reserved to the Commissioner and excluded from those portions of a medical opinion an ALJ must address." (at 2)

"To the extent the ALJ failed to properly reject Plaintiff's fiancée's observations of Plaintiff's social activity and difficulties handling stress, the ALJ nevertheless properly found Plaintiff's capabilities in such areas did not demonstrate he had severe mental impairments." (at 7)

FACTUAL BACKGROUND

Jeffery C. applied for SSI and DIB, alleging disability beginning February 14, 2018. After a March 12, 2024 hearing, the ALJ found him not disabled. In reviewing the ALJ's evaluation of medical opinions and a lay-

witness statement, the district court focused on the evidentiary support for the ALJ's findings, including examination results, the absence of medical necessity for a cane, imaging showing only mild to moderate disc protrusion, and evidence that Plaintiff performed construction work.

PROCEDURAL HISTORY

Plaintiff applied for SSI and DIB, received an administrative hearing before an ALJ, and was found not disabled. The Appeals Council denied review, making the ALJ's decision final agency action. Plaintiff then filed this action, and the court affirmed the Commissioner's decision, finding no reversible error.

DISPOSITION

affirmed

CASES CITED

- Bayliss v. Barnhart, 427 F.3d 1211, 1214 n.1 (9th Cir. 2005)
- Tidwell v. Apfel, 161 F.3d 599, 601 (9th Cir. 1998)
- Woods v. Kijakazi, 32 F.4th 785, 791 (9th Cir. 2022)
- Ford v. Saul, 950 F.3d 1141, 1156 (9th Cir. 2020)
- Stiffler v. O'Malley, 102 F.4th 1102, 1107 (9th Cir. 2024)
- Molina v. Astrue, 674 F.3d 1104, 1115-16, 1116-22 (9th Cir. 2012)
- Chaudhry v. Astrue, 688 F.3d 661, 671 (9th Cir. 2012)
- Burch v. Barnhart, 400 F.3d 676, 681 (9th Cir. 2005)
- Dodrill v. Shalala, 12 F.3d 915, 919 (9th Cir. 1993)
- Rhea L. v. Comm'r of Soc. Sec., No. 2:24-CV-870, 2024 WL 5244402, at *4-5 (W.D. Wash. Dec. 30, 2024)