

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NEW YORK

Bridget L. B. v. Commissioner of Social Security

Bridget L. B. · No. 6:23-CV-6410-A · Decided February 13, 2026

SUMMARY

The United States District Court for the Western District of New York upheld the Commissioner of Social Security’s denial of Bridget Lynn B.’s applications for Disability Insurance Benefits and Supplemental Security Income. The court concluded that the Administrative Law Judge’s residual functional capacity determination was supported by substantial evidence, that the medical opinions were not stale, and that further development of the record was unnecessary. The Commissioner’s motion for judgment on the pleadings was granted, and Plaintiff’s motion was denied.

CASE DETAILS

COURT	United States District Court for the Western District of New York
WRITING FOR THE COURT	Richard J. Arcara
JURISDICTION	United States District Court for the Western District of New York
DECIDED	February 13, 2026
DOCKET	6:23-CV-6410-A
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. §§ 405(g) and 1383(c) (3) of the Commissioner of Social Security's final denial of her applications for Disability Insurance Benefits and Supplemental Security Income. The parties filed cross-motions for judgment on the pleadings under Federal Rule of Civil Procedure 12(c).
STANDARD OF REVIEW	The court reviews the Commissioner's final decision to determine whether it is supported by substantial evidence and based on the correct legal standard. A decision supported by substantial evidence is sustained even if substantial evidence also supports the claimant's contrary position.
PRECEDENTIAL VALUE	Unknown; unpublished district court decision
PARTIES	Bridget L. B. v. Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

motion for judgment on the pleadings

disability definition

civil procedure

PRACTICE AREAS

Social Security disability

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ's residual functional capacity determination was supported by substantial evidence despite Plaintiff's contention that the medical opinions were stale because of later knee, cubital tunnel, and trigger-finger problems.
2. Whether the ALJ improperly relied on his own lay interpretation of the medical evidence in formulating the residual functional capacity.
3. Whether the ALJ was required to further develop the administrative record or obtain an updated consultative examination or medical opinion.

HOLDINGS

1. The medical opinions were not rendered stale merely because they predated some later medical developments. The record did not establish significant deterioration or a functional change sufficient to undermine the opinions, and the ALJ considered the later evidence in formulating the RFC.
2. The ALJ did not improperly rely on lay interpretation. An RFC finding is administrative in nature and may be formulated from all relevant evidence, including testimony, objective findings, treatment records, and medical opinions; it need not perfectly correspond to a single medical opinion.
3. The ALJ was not required to further develop the record or order an additional consultative examination because the evidence already presented was adequate to determine disability and Plaintiff identified no obvious gap in the administrative record.

KEY QUOTATIONS

"An RFC finding is administrative in nature, not medical, and its determination is within the province of the ALJ, as the Commissioner's regulations make clear." (T. 29-30)

"The ALJ is 'not required to develop the record any further when the evidence already presented is adequate for [the ALJ] to make a determination as to disability.'" (T. 30)

FACTUAL BACKGROUND

Plaintiff alleged disability beginning February 20, 2020, based on physical and mental impairments including diabetes, neuropathy, bilateral knee problems, shoulder conditions, cubital tunnel syndrome, trigger finger, anxiety, and depression. The ALJ found several severe impairments but determined that they did not meet or medically equal a listed impairment. The ALJ assessed a sedentary-work residual functional capacity with additional postural, environmental, manipulative, and mental limitations, and concluded at step five that Plaintiff could perform jobs existing in significant numbers in the national economy. Plaintiff challenged the RFC,

principally arguing that the medical opinions were stale and that the ALJ improperly relied on lay interpretation of the medical evidence and failed to develop the record.

PROCEDURAL HISTORY

Plaintiff's DIB and SSI applications were denied initially and on reconsideration. After a telephonic hearing, an ALJ issued an unfavorable decision on January 18, 2022. The Appeals Council denied review on May 26, 2023, making the ALJ's decision final. The district court granted the Commissioner's motion for judgment on the pleadings, denied Plaintiff's motion, affirmed the denial of benefits, and directed the Clerk to close the case.

DISPOSITION

affirmed

CASES CITED

- Schaal v. Apfel, 134 F.3d 496, 500-01 (2d Cir. 1998)
- Burgess v. Astrue, 537 F.3d 117, 128 (2d Cir. 2008)
- Talavera v. Astrue, 697 F.3d 145, 151 (2d Cir. 2012)
- Ashley C. v. Saul, 3:19-cv-1212 (MAD), 2020 U.S. Dist. LEXIS 201474, *6 (N.D.N.Y. Oct. 29, 2020)
- Schauer v. Schweiker, 675 F.2d 55, 57 (2d Cir. 1982)
- Richardson v. Perales, 402 U.S. 389, 401 (1971)
- Pourpore v. Astrue, 566 F.3d 303, 306 (2d Cir. 2009)
- Clute ex rel. McGuire v. Comm'r of Soc. Sec., 18-CV-30-FPG, 2018 U.S. Dist. LEXIS 215156, *12 (W.D.N.Y. Dec. 21, 2018)
- Camille v. Colvin, 104 F. Supp. 3d 329, 343 (W.D.N.Y. 2015), aff'd, 652 F. App'x 25 (2d Cir. 2016) (summary order)
- Anthony F. v. Comm'r of Soc. Sec., 23-CV-00033-FPG, 2023 U.S. Dist. LEXIS 199058, *12 (W.D.N.Y. Nov. 6, 2023)
- Diane B. v. Comm'r of Soc. Sec., 19-CV-628S, 2021 U.S. Dist. LEXIS 94182, *15 (W.D.N.Y. May 18, 2021)
- Steve P. v. Comm'r of Soc. Sec., 19-CV-0492 (MWP), 2021 U.S. Dist. LEXIS 17640, *14-15 (W.D.N.Y. Jan. 29, 2021)
- Jennifer O. v. Comm'r of Soc. Sec., 1:20-CV-1474 (WBC), 2022 U.S. Dist. LEXIS 123942, *17-19 (W.D.N.Y. July 13, 2022)
- Vincent B. v. Comm'r of Soc. Sec., 561 F. Supp. 3d 362, 367 (W.D.N.Y. 2021)
- Curry v. Comm'r of Soc. Sec., 855 F. App'x 46, 48 n.3 (2d Cir. May 14, 2021) (summary order)
- Matta v. Astrue, 508 F. App'x 53, 56 (2d Cir. 2013) (summary order)
- Janes v. Berryhill, 710 F. App'x 33, 34 (2d Cir. 2018) (summary order)
- Rosa v. Callahan, 168 F.3d 72, 79 n.5 (2d Cir. 1999)

