

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
WASHINGTON

Derek R. v. Acting Commissioner of Social Security

Derek R. · No. 3:25-cv-05209-TLF · Decided January 23, 2026

SUMMARY

The United States District Court for the Western District of Washington reviewed the denial of Derek R.'s applications for supplemental security income and disability insurance benefits. The court held that the ALJ inadequately evaluated the claimant's testimony, medical opinions, and lay-witness statements concerning cyclical mental-health limitations. The court reversed the unfavorable decision and remanded for an award of benefits.

CASE DETAILS

COURT	United States District Court for the Western District of Washington
WRITING FOR THE COURT	Theresa L. Fricke
JURISDICTION	United States District Court for the Western District of Washington
DECIDED	January 23, 2026
DOCKET	3:25-cv-05209-TLF
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Judicial review under 42 U.S.C. § 405(g) of the Acting Commissioner's final decision denying the plaintiff's applications for supplemental security income and disability insurance benefits.
STANDARD OF REVIEW	The court may set aside the Commissioner's denial only if the ALJ's findings are based on legal error or are not supported by substantial evidence in the record as a whole. The court must consider the administrative record as a whole and may not affirm on a ground on which the ALJ did not rely.
PRECEDENTIAL VALUE	unpublished
PARTIES	Derek R. v. Acting Commissioner of Social Security

TOPICS

- judicial review of agency action
- administrative law
- remedies

PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ provided legally sufficient and substantial-evidence-supported reasons for rejecting the plaintiff's testimony about mental-health symptoms and limitations.
2. Whether the ALJ provided legally sufficient reasons for rejecting the marked limitations assessed by examining medical sources and the plaintiff's counselor.
3. Whether the ALJ provided germane reasons for rejecting lay-witness statements.
4. Whether the record required remand for further administrative proceedings or an award of benefits.

HOLDINGS

1. The ALJ failed to provide adequate specific, clear, and convincing reasons for rejecting the plaintiff's testimony about limitations associated with his cyclical mental-health conditions.
2. The ALJ failed to provide legally sufficient reasons for rejecting the marked limitations assessed by the examining doctors and the plaintiff's counselor.
3. The ALJ failed to provide germane reasons for rejecting the statements of the plaintiff's mother, partner, half-brother, and roommate.
4. The case must be remanded for an award of benefits rather than further administrative proceedings.

KEY QUOTATIONS

"The ALJ must "set forth the reasoning behind [his] decision[] in a way that allows for meaningful review.""
(at 4)

"When such outstanding issues remain, the Court "cannot deem the erroneously disregarded testimony to be true; rather, the court must remand for further proceedings."" (at 10)

"For those reasons, the Court concludes the ALJ improperly determined plaintiff to be not disabled. Therefore, the ALJ's decision is reversed and remanded for award of benefits." (at 11)

FACTUAL BACKGROUND

Derek R. alleged disability based principally on cyclical depression, anxiety, social difficulties, impaired concentration and motivation, and right-hand pain. He testified that his mental symptoms varied over time and interfered with interacting with others, handling authority figures, maintaining motivation and concentration, and sustaining work; multiple examining sources and his counselor identified marked limitations, including absences and psychological interruptions. The ALJ discounted much of this evidence based largely on normal examination findings, conservative treatment, and daily activities, but the district court found that analysis failed to account for abnormal findings and the cyclical nature of the conditions.

PROCEDURAL HISTORY

The plaintiff's applications were denied initially and on reconsideration. After multiple administrative hearings and two prior district-court reversals, the ALJ issued an unfavorable decision on November 13, 2024. The plaintiff filed this action after the ALJ's decision became the Commissioner's final decision when he filed no exceptions with the Appeals Council.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Reverse the ALJ's decision and remand for an award of benefits.

CASES CITED

- Revels v. Berryhill, 874 F.3d 648, 654 (9th Cir. 2017)
- Biestek v. Berryhill, 139 S. Ct. 1148, 1154 (2019)
- Garrison v. Colvin, 759 F.3d 995, 1009, 1014 n.17, 1017, 1020 (9th Cir. 2014)
- Smolen v. Chater, 80 F.3d 1273, 1281 (9th Cir. 1996)
- Brown-Hunter v. Colvin, 806 F.3d 487, 492 (9th Cir. 2015)
- Ferguson v. O'Malley, 95 F.4th 1194, 1200, 1203 (9th Cir. 2024)
- Fair v. Bowen, 885 F.2d 597, 604 (9th Cir. 1989)
- Orn v. Astrue, 495 F.3d 625, 639 (9th Cir. 2007)
- Reddick v. Chater, 157 F.3d 715, 722 (9th Cir. 1998)
- Carmickle v. Commissioner of Social Security Administration, 533 F.3d 1155, 1161 & n.2 (9th Cir. 2008)
- Lester v. Chater, 81 F.3d 821, 830-31 (9th Cir. 1995)
- Molina v. Astrue, 674 F.3d 1104, 1111 (9th Cir. 2012)
- Paladin Associates, Inc. v. Montana Power Co., 328 F.3d 1145, 1164 (9th Cir. 2003)
- Dodrill v. Shalala, 12 F.3d 915, 919 (9th Cir. 1993)
- Leon v. Berryhill, 880 F.3d 1041, 1044-45 (9th Cir. 2017)
- Treichler v. Commissioner of Social Security Administration, 775 F.3d 1090, 1101 (9th Cir. 2014)
- Dominguez v. Colvin, 808 F.3d 403, 409 (9th Cir. 2015)