

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Bryan W. v. Commissioner of Social Security

Bryan W. · No. Civil Action No. 24-06717 (KMW) · Decided March 9, 2026

SUMMARY

The United States District Court for the District of New Jersey reviewed a pro se claimant’s appeal from the Commissioner of Social Security’s denial of disability benefits. The court held that the administrative law judge applied the proper sequential analysis and that the decision was supported by substantial evidence, and therefore affirmed the Commissioner’s decision.

CASE DETAILS

COURT	United States District Court for the District of New Jersey
WRITING FOR THE COURT	Karen M. Williams
JURISDICTION	United States District Court for the District of New Jersey
DECIDED	March 9, 2026
DOCKET	Civil Action No. 24-06717 (KMW)
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying his application for Social Security Disability Insurance benefits and supplemental security income.
STANDARD OF REVIEW	The court reviews factual findings for substantial evidence and reviews legal issues de novo or plenary. It may not reweigh the evidence or substitute its judgment for that of the Commissioner when the decision is supported by substantial evidence. The claimant bears the burden of showing harmful error.
PRECEDENTIAL VALUE	Unknown; district court opinion with no stated precedential status
PARTIES	Bryan W. v. Commissioner of Social Security

TOPICS

- judicial review of agency action
- administrative law
- disability definition

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the ALJ's finding that Plaintiff was not disabled was supported by substantial evidence.
2. Whether the ALJ properly applied the Social Security Act's five-step sequential evaluation process.
3. Whether the ALJ's residual functional capacity assessment was supported by substantial evidence.
4. Whether the ALJ was required to treat Plaintiff's earlier disability determination following a 2007 motorcycle accident as binding for the later alleged disability period.

HOLDINGS

1. The Commissioner's decision must be affirmed because the ALJ followed the required sequential evaluation and the findings, including the residual functional capacity and step-five determination, were supported by substantial evidence.
2. The ALJ properly applied the Commissioner's five-step sequential analysis for determining disability.
3. The ALJ's residual functional capacity assessment limiting Plaintiff to sedentary work with additional postural, environmental, and assistive-device restrictions was supported by substantial evidence.
4. An earlier disability determination concerning a different period is not binding on the ALJ when evaluating a subsequent period of alleged disability.

KEY QUOTATIONS

"The ALJ found that Plaintiff's medically determinable impairments could reasonably be expected to cause the alleged symptoms; but that Plaintiff's statements regarding intensity, persistence, and limiting effects of those symptoms were not entirely consistent with the medical evidence and other evidence in the record," (R. 36-39)

"It is clear to the Court, that the ALJ's analysis and evidence relied upon clearly meets the low "more than a scintilla" bar it must in order to constitute substantial evidence." (11)

FACTUAL BACKGROUND

Plaintiff alleged disability beginning March 20, 2021, based on venous disease, obesity, degenerative joint disease of the hips and knees, complications from hernia surgery, gout, and related difficulty walking. He had past work as a building maintenance worker, groundskeeper, carpenter's helper, and glazier, and stopped working in March 2021. The ALJ found severe impairments but determined that Plaintiff retained the residual functional capacity for sedentary work with additional restrictions and could perform other jobs existing in significant numbers in the national economy.

PROCEDURAL HISTORY

Plaintiff's applications were denied initially and on reconsideration. After a hearing, the ALJ determined that Plaintiff was not disabled, and the Appeals Council affirmed. Plaintiff timely appealed to the district court, which reviewed the administrative record and affirmed the Commissioner's decision.

DISPOSITION

affirmed

CASES CITED

- Knepp v. Apfel, 204 F.3d 78, 83 (3d Cir. 2000)
- Morales v. Apfel, 225 F.3d 310, 316 (3d Cir. 2000)
- Rutherford v. Barnhart, 399 F.3d 546, 552-53 (3d Cir. 2005)
- Ginsburg v. Richardson, 436 F.2d 1146, 1148 (3d Cir. 1971)
- Fargnoli v. Massanari, 247 F.3d 34, 38 (3d Cir. 2001)
- Friedberg v. Schweiker, 721 F.2d 445, 447 (3d Cir. 1983)
- Sykes v. Apfel, 228 F.3d 259, 262 (3d Cir. 2000)
- Schaudeck v. Commissioner of Social Security, 181 F.3d 429, 431 (3d Cir. 1999)
- Smith, 631 F.3d at 634
- Hess v. Commissioner of Social Security, 931 F.3d 198, 201-02 (3d Cir. 2019)
- Podedworny v. Harris, 745 F.2d 210, 218 (3d Cir. 1984)
- Shinseki v. Sanders, 556 U.S. 396, 409, 413 (2009)
- Hartranft v. Apfel, 181 F.3d 358, 360 (3d Cir. 1999)
- Russell v. Kijakazi, 2023 WL 2278651, at *5 (E.D. Pa. 2023)
- Zavilla v. Astrue, 2009 WL 3364853, at *13 (W.D. Pa. 2009)
- Carter v. Barnhart, 2005 WL 1249218, at *2 (3d Cir. 2005)
- Biestek v. Berryhill, 139 S. Ct. 1148, 1154-55 (2019)

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