

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Sullivan v. Commissioner of Social Security

No. 2:24-cv-00016-CSK (E.D. Cal. Mar. 11, 2025) · No. 2:24-cv-00016-CSK · Decided March 11, 2025

SUMMARY

The Eastern District of California denied Antionette Y. Sullivan’s motions for summary judgment and granted the Commissioner of Social Security’s cross-motion in a Social Security disability case. The court held that Sullivan did not identify a legal error in the Administrative Law Judge’s decision and could not obtain consideration of medical records outside the administrative transcript. Judgment was entered for the Commissioner, and the case was closed.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Chi Soo Kim
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	March 11, 2025
DOCKET	2:24-cv-00016-CSK
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying supplemental security income. The parties filed cross-motions for summary judgment.
STANDARD OF REVIEW	The court may reverse the Commissioner's decision only if the ALJ committed legal error or the decision is unsupported by substantial evidence. Substantial evidence is more than a mere scintilla but less than a preponderance and means such relevant evidence as a reasonable mind might accept as adequate to support a conclusion. The court reviews evidence that supports and detracts from the ALJ's conclusion, may not affirm on a ground on which the ALJ did not rely, and must uphold the decision when the evidence is susceptible to more than one rational interpretation or any error is harmless.
PRECEDENTIAL VALUE	unpublished
PARTIES	Antionette Y. Sullivan v. Commissioner of Social Security

TOPICS

judicial review of agency action

summary judgment

administrative law

civil procedure

PRACTICE AREAS

Social Security disability

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the district court could consider medical records attached to Sullivan's motion that were not part of the administrative transcript.
2. Whether Sullivan established a reversible legal or evidentiary error in the ALJ's denial of supplemental security income.
3. Whether any alleged error concerning the bipolar-disorder finding was harmless.

HOLDINGS

1. The court could not consider medical records attached to Sullivan's motion that were not part of the administrative transcript because Sullivan did not establish the materiality of the evidence or good cause for failing to incorporate it into the prior administrative proceeding.
2. A plaintiff seeking judicial review of a Social Security decision must present a specific legal or factual challenge to the ALJ's decision; the court cannot rule for the plaintiff when no legal argument or particular ALJ error is presented.
3. Any error in the ALJ's treatment of bipolar disorder would have been harmless because the ALJ found that the impairment caused no more than minimal limitations.

KEY QUOTATIONS

"Substantial evidence is "more than a mere scintilla" but "less than a preponderance," i.e., such relevant evidence as a reasonable mind might accept as adequate to support a conclusion." (at 2)

"The court may not consider evidence outside of the administrative transcript when deciding to affirm, modify, or reverse the ALJ's decision." (at 4)

FACTUAL BACKGROUND

Sullivan applied for Title XVI supplemental security income, alleging disability based on bipolar disorder, back pain, a prior leg injury, spasms, and depression. The ALJ found severe physical impairments but determined that bipolar disorder was nonsevere, assessed a residual functional capacity for a restricted range of light work, and found Sullivan unable to perform past relevant work but able to perform other work existing in the national economy. In district court, Sullivan challenged the accuracy of medical records and asserted that she had not been diagnosed with or prescribed medication for bipolar disorder, but did not identify an error in the ALJ's decision or establish that records outside the administrative transcript were material and could not previously have been submitted.

PROCEDURAL HISTORY

Sullivan applied for supplemental security income in October 2020. After the claim was denied initially and on reconsideration, an administrative law judge denied benefits on November 7, 2022, and the Appeals Council denied review on October 31, 2023, making the ALJ's decision final. Sullivan then filed this action and challenged the accuracy of medical records, but did not identify a specific legal or factual error in the ALJ's decision. The district court denied Sullivan's motions for summary judgment, granted the Commissioner's cross-motion, entered judgment for the Commissioner, and closed the case.

DISPOSITION

affirmed

CASES CITED

- Lester v. Chater, 81 F.3d 821, 828 n.5 (9th Cir. 1995)
- Ford v. Saul, 950 F.3d 1141, 1148, 1154 (9th Cir. 2020)
- Brewes v. Comm'r., 682 F.3d 1157, 1161-62 (9th Cir. 2012)
- Mata v. Colvin, 2014 WL 5472784, at *4 (E.D. Cal. Oct. 28, 2014)
- Indep. Towers of Wash. v. Washington, 350 F.3d 925, 929 (9th Cir. 2003)
- Luther v. Berryhill, 891 F.3d 872, 875 (9th Cir. 2018)
- Sfetku v. Commissioner of Social Security Administration, 2019 WL 92499, at *12 (D. Ariz. Jan. 3, 2019)
- Mayes v. Massanari, 276 F.3d 453, 462-63 (9th Cir. 2001)
- Orteza v. Shalala, 50 F.3d 748, 751 (9th Cir. 1995)
- Bernhardt v. L.A. Cty., 339 F.3d 920, 925 (9th Cir. 2003)
- Turner v. Berryhill, 2019 WL 560247, at *4-5 (E.D. Cal. Feb. 12, 2019)
- Hibbs v. Dep't of Human Resources, 273 F.3d 844, 873 n.34 (9th Cir. 2001)
- Rigsbay v. Colvin, 2016 WL 1268006, at *3 (E.D. Cal. Mar. 30, 2016)
- Molina v. Astrue, 674 F.3d 1104, 1111 (9th Cir. 2012)
- Tommasetti v. Astrue, 533 F.3d 1035, 1038 (9th Cir. 2008)