

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
OHIO, WESTERN DIVISION

Echo Jordana Schwan v. Commissioner of Social Security

Schwan · No. 3:25 CV 591 · Decided February 26, 2026

SUMMARY

The United States District Court for the Northern District of Ohio reviewed a Social Security disability benefits decision under 42 U.S.C. § 405(g). The court overruled Echo Jordana Schwan’s objection to the magistrate judge’s Report and Recommendation, adopted the recommendation, and affirmed the Commissioner’s decision. The court held that the residual functional capacity finding was consistent with the vocational expert’s hypothetical and was supported by substantial evidence.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio, Western Division
WRITING FOR THE COURT	James R. Knepp II
JURISDICTION	United States District Court for the Northern District of Ohio, Western Division
DECIDED	February 26, 2026
DOCKET	3:25 CV 591
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner of Social Security's denial of benefits. After the magistrate judge issued a Report and Recommendation recommending affirmance, Plaintiff objected and the Commissioner responded.
STANDARD OF REVIEW	The district court reviewed the challenged portions of the magistrate judge's Report and Recommendation de novo under 28 U.S.C. § 636(b)(1) and Federal Rule of Civil Procedure 72(b)(2)-(3). In reviewing the Commissioner's decision, the court affirmed absent an incorrect legal standard or findings unsupported by substantial evidence.
PRECEDENTIAL VALUE	unpublished, nonprecedential district court memorandum opinion and order

PARTIES

Echo Jordana Schwan v. Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

civil procedure

PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ's residual-functional-capacity finding matched the hypothetical presented to the vocational expert.
2. Whether the ALJ's treatment of Schwan's lifting and carrying limitations required additional explanation concerning erosion of the sedentary occupational base under SSR 96-9p.
3. Whether the ALJ's Step Five finding was supported by substantial evidence.

HOLDINGS

1. The ALJ's RFC limiting Schwan to sedentary work while allowing frequent lifting and carrying of less than ten pounds was consistent with a hypothetical allowing occasional lifting and carrying of ten pounds and frequent lifting and carrying of less than ten pounds.
2. The vocational expert's testimony constituted substantial evidence supporting the ALJ's finding that Schwan could perform jobs existing in significant numbers in the national economy.
3. The ALJ was not required to provide additional erosion analysis under SSR 96-9p because the RFC did not render Schwan unable to lift ten pounds or unable to occasionally lift and carry articles such as docket files, ledgers, and small tools.

KEY QUOTATIONS

"The Court thus disagrees with Plaintiff's argument and agrees with the R&R that the hypothetical question matched the ALJ's RFC." (Discussion)

"Plaintiff's objection is OVERRULED, Judge Clay's R&R (Doc. 13) is ADOPTED as the Order of this Court, and the Commissioner's decision is AFFIRMED." (Conclusion)

FACTUAL BACKGROUND

Echo Jordana Schwan applied for supplemental security income and disability insurance benefits in May 2023. The ALJ determined that she retained the residual functional capacity to perform sedentary work, including lifting and carrying ten pounds occasionally and less than ten pounds frequently, and found her not disabled. A vocational expert testified that a person with those limitations could perform jobs including small parts sorter, document preparer, and address clerk.

PROCEDURAL HISTORY

Plaintiff applied for supplemental security income and disability insurance benefits, and an ALJ found her not disabled on April 25, 2024. The magistrate judge recommended affirming the Commissioner's decision, concluding that the ALJ properly assessed the erosion of the sedentary occupational base and relied on vocational-expert testimony. The district court conducted de novo review of the objection, overruled it, adopted the Report and Recommendation, and affirmed.

DISPOSITION

affirmed

CASES CITED

- Walters v. Commissioner of Social Security, 127 F.3d 525, 528 (6th Cir. 1997)
- Colvin v. Barnhart, 475 F.3d 727, 730 (6th Cir. 2007)
- McClanahan v. Commissioner of Social Security, 474 F.3d 830, 833 (6th Cir. 2006)
- Swain v. Commissioner of Social Security, 379 F. App'x 512, 517-18 (6th Cir. 2010)
- Wohler v. Saul, 2020 WL 1531296, at *13 (N.D. Ohio)
- Davis v. Secretary of Health & Human Services, 867 F.2d 336, 340 (6th Cir. 1989)

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