

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
NEW YORK

Joseph M. R. v. Commissioner of Social Security

Joseph M. R. · No. 5:24-CV-1065 (FJS/ML) · Decided March 25, 2026

SUMMARY

The United States District Court for the Northern District of New York reviewed objections to a magistrate judge's Report-Recommendation in a Social Security Disability Insurance case. The court found no clear error, adopted the Report-Recommendation, denied the plaintiff's motion for judgment on the pleadings, granted the Commissioner's motion, affirmed the decision, and directed entry of judgment for the defendant.

CASE DETAILS

COURT	United States District Court for the Northern District of New York
WRITING FOR THE COURT	Frederik J. Scullin, Jr.
JURISDICTION	United States District Court for the Northern District of New York
DECIDED	March 25, 2026
DOCKET	5:24-CV-1065 (FJS/ML)
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying Disability Insurance Benefits. After a magistrate judge recommended denying plaintiff's motion for judgment on the pleadings, granting defendant's motion, and affirming the Commissioner's decision, plaintiff objected. The district court reviewed the objections and adopted the Report-Recommendation.
STANDARD OF REVIEW	The district court reviews specific objections to a magistrate judge's report and recommendation de novo under Fed. R. Civ. P. 72(b)(2) and 28 U.S.C. § 636(b)(1)(C). When objections merely rehash arguments previously presented, the challenged portions are reviewed for clear error. The underlying Social Security decision is upheld when supported by substantial evidence and based on correct legal standards.
PRECEDENTIAL VALUE	unpublished district-court memorandum decision

PARTIES

Joseph M. R. v. Commissioner of Social Security

TOPICS

judicial review of agency action

motion for judgment on the pleadings

administrative law

civil procedure

PRACTICE AREAS

Social Security disability

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the magistrate judge's Report-Recommendation contained clear error in concluding that substantial evidence supported the ALJ's evaluation of plaintiff's subjective complaints.
2. Whether the ALJ adequately evaluated the medical opinion evidence and whether the residual functional capacity determination was supported by substantial evidence.
3. Whether the ALJ adequately investigated and resolved an apparent conflict between the vocational expert's testimony regarding occasional overhead reaching and the Dictionary of Occupational Titles.
4. Whether the vocational expert's identification of approximately 9,000 racker jobs, together with the other identified occupations, supported the step-five determination.

HOLDINGS

1. Because plaintiff's objections merely repeated arguments made before the magistrate judge, the district court reviewed the challenged portions for clear error rather than de novo.
2. The ALJ's evaluation of plaintiff's subjective complaints was supported by substantial evidence and was entitled to substantial deference.
3. The ALJ appropriately evaluated the conflicting medical opinion evidence, and the determination that plaintiff could perform less than the full range of light work was supported by substantial evidence.
4. The ALJ satisfied the obligation to investigate and resolve the apparent conflict between the vocational expert's testimony concerning overhead reaching and the Dictionary of Occupational Titles.

KEY QUOTATIONS

"The VE's testimony provides a reasonable explanation for the conflict which, in turn, provides a basis for the ALJ's reliance on it." (28)

"Magistrate Judge Lovric's Report-Recommendation, see Dkt. No. 17, is ADOPTED AND ACCEPTED in its entirety" (IV. Conclusion)

FACTUAL BACKGROUND

Plaintiff applied for Disability Insurance Benefits, alleging limitations from neck and arm pain and related impairments. The ALJ found that plaintiff could perform less than the full range of light work, including only occasional overhead reaching, and identified representative occupations through vocational-expert testimony.

The administrative record included evidence of improved functioning with physical therapy, chiropractic treatment, epidural injections, and medication, as well as daily activities and vocational training suggesting an ability to perform work-related tasks.

PROCEDURAL HISTORY

Plaintiff challenged the Administrative Law Judge's evaluation of his subjective complaints, medical opinions, residual functional capacity, and vocational-expert testimony concerning conflicts with the Dictionary of Occupational Titles. Magistrate Judge Lovric recommended judgment for the Commissioner. Because plaintiff's objections merely renewed arguments presented to the magistrate judge, the district court applied clear-error review and found no clear error in the Report-Recommendation or the ALJ's decision.

DISPOSITION

affirmed

CASES CITED

- Petersen v. Astrue, 2 F. Supp. 3d 223, 228-29 (N.D.N.Y. 2013)
- Dezarea W. v. Comm'r of Soc. Sec., No. 6:21-CV-01138 (MAD/TWD), 2023 WL 2552452, at *1 (N.D.N.Y. Mar. 17, 2023)
- Canady v. Comm'r of Soc. Sec., No. 1:17-CV-0367, 2017 WL 5484663, at *1 n.1 (N.D.N.Y. Nov. 14, 2017)
- Batista v. Walker, No. 94-CV-2826, 1995 WL 453299, at *1 (S.D.N.Y. July 31, 1995)
- Judelsohn v. Astrue, No. 11-CV-388S, 2012 WL 2401587, at *6 (W.D.N.Y. June 25, 2012)
- Dumas v. Schweiker, 712 F.2d 1545, 1552 (2d Cir. 1983)
- Wendy L. B. v. Kijakazi, No. 5:22-CV-0708 (DNH/DEP), 2023 WL 3728557, at *7 (N.D.N.Y. May 5, 2023)
- John L.M. v. Kijakazi, No. 5:21-CV-368 (BKS/TWD), 2022 WL 3500187, at *3 (N.D.N.Y. Aug. 18, 2022)
- Matta v. Astrue, 508 F. App'x 53, 56 (2d Cir. 2013)
- Lockwood v. Comm'r of Soc. Sec.
- Matthew M. v. Comm'r of Soc. Sec.
- Thomas K. v. Comm'r of Soc. Sec., No. 1:22-CV-00673 (TPK), 2025 WL 484178, at *5 (W.D.N.Y. Feb. 13, 2025)