

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF IDAHO

Timothy Kay H. v. Commissioner of Social Security

Timothy Kay H. v. Commissioner of Social Security · No. 4:25-cv-00173-REP · Decided March 19, 2026

SUMMARY

The United States District Court for the District of Idaho reviews the denial of Timothy Kay H.'s application for Social Security disability insurance benefits. The court holds that the Administrative Law Judge provided sufficient reasons for discounting the claimant's subjective symptom testimony and adequately evaluated the treating provider's opinion concerning additional work limitations. The court affirms the administrative decision and denies remand.

CASE DETAILS

COURT	United States District Court for the District of Idaho
WRITING FOR THE COURT	Raymond E. Patricco
JURISDICTION	United States District Court for the District of Idaho
DECIDED	March 19, 2026
DOCKET	4:25-cv-00173-REP
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 disability insurance benefits. The district court affirmed the Commissioner's decision and dismissed the action with prejudice.
STANDARD OF REVIEW	The court reviews the Commissioner's decision under 42 U.S.C. § 405(g) to determine whether it is supported by substantial evidence and based on proper legal standards. Factual findings supported by substantial evidence are conclusive, and the court may not substitute its judgment for the ALJ's where the evidence permits more than one rational interpretation. Legal error requires reversal.
PRECEDENTIAL VALUE	Unknown; district court memorandum decision and order with no reporter citation.
PARTIES	Timothy Kay H. v. Commissioner of Social Security

TOPICS

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether the ALJ provided legally sufficient, clear and convincing reasons supported by substantial evidence for discounting Plaintiff's subjective symptom testimony.
2. Whether the ALJ properly evaluated Amanda Thompson, FNP-C's medical-source opinion under the post-2017 regulations and whether the RFC adequately included limitations supported by the record.

HOLDINGS

1. The ALJ properly discounted Plaintiff's subjective symptom testimony because the ALJ identified clear and convincing reasons supported by substantial evidence, including inconsistency with objective medical evidence, improvement with treatment, inconsistent daily activities, and a significant treatment gap.
2. The ALJ properly found Amanda Thompson's opinion unpersuasive under the supportability and consistency factors and was not required to include unscheduled breaks, reclining periods, frequent absences, or additional cognitive limitations in the RFC because those limitations were not supported by the record.

KEY QUOTATIONS

"The standard requires more than a scintilla but less than a preponderance."

"A diagnosis alone does not establish disabling functional limitations; rather, Plaintiff must demonstrate how the impairment translates into work-related restrictions."

FACTUAL BACKGROUND

Plaintiff alleged disability beginning May 4, 2021, based primarily on migraines, post-concussive symptoms, cervical spine impairments, dizziness, fatigue, cognitive difficulties, and upper-extremity numbness. The ALJ found severe impairments consisting of cervical-spine degenerative disc disease and migraines, but found that Plaintiff retained an RFC for medium work with specified climbing, hazard, handling, and fingering restrictions. The ALJ relied on largely normal neurological and physical examinations, improvement with treatment, daily activities, and a gap in treatment in discounting the alleged severity of Plaintiff's symptoms. The ALJ also found the restrictive opinion of treating provider Amanda Thompson, FNP-C, unpersuasive because it was unsupported by her treatment notes and inconsistent with the broader medical record.

PROCEDURAL HISTORY

Plaintiff filed a Title II application for disability insurance benefits, which was denied initially and on reconsideration. Following a telephonic hearing, an ALJ denied the claim on April 3, 2024. The Appeals Council

denied review on February 21, 2025, making the ALJ's decision the Commissioner's final decision. Plaintiff then filed this action, challenging the evaluation of his subjective symptom testimony and the RFC assessment.

DISPOSITION

affirmed

CASES CITED

- Trevizo v. Berryhill, 871 F.3d 664, 674 (9th Cir. 2017)
- Treichler v. Commissioner of Social Security Administration, 775 F.3d 1090, 1098 (9th Cir. 2014)
- Richardson v. Perales, 402 U.S. 389, 401 (1971)
- Ludwig v. Astrue, 681 F.3d 1047, 1051 (9th Cir. 2012)
- Pierce v. Underwood, 487 U.S. 552, 565 (1988)
- Batson v. Commissioner of Social Security, 359 F.3d 1190, 1193, 1196 (9th Cir. 2004)
- Zavalin v. Colvin, 778 F.3d 842, 845 (9th Cir. 2015)
- Garrison v. Colvin, 759 F.3d 995, 1011 (9th Cir. 2014)
- Reddick v. Chater, 157 F.3d 715, 722 (9th Cir. 1998)
- Fair v. Bowen, 885 F.2d 597, 603-04 (9th Cir. 1989)
- Greger v. Barnhart, 464 F.3d 968, 972 (9th Cir. 2006)
- Lingenfelter v. Astrue, 504 F.3d 1028, 1035-36 (9th Cir. 2007)
- Bunnell v. Sullivan, 947 F.2d 341, 344-46 (9th Cir. 1991)
- Thomas v. Barnhart, 278 F.3d 947, 958-59 (9th Cir. 2002)
- Brown-Hunter v. Colvin, 806 F.3d 487, 493 (9th Cir. 2015)
- Smartt v. Kijakazi, 53 F.4th 489, 498-99 (9th Cir. 2022)
- Carmickle v. Commissioner of Social Security Administration, 533 F.3d 1155, 1161-63 (9th Cir. 2008)
- Wellington v. Berryhill, 878 F.3d 867, 876 (9th Cir. 2017)
- Warre v. Commissioner of Social Security Administration, 439 F.3d 1001, 1006 (9th Cir. 2006)
- Molina v. Astrue, 674 F.3d 1104, 1121 (9th Cir. 2012)
- Woods v. Kijakazi, 32 F.4th 785, 787, 792 (9th Cir. 2022)
- Young v. Sullivan, 911 F.2d 180, 183-84 (9th Cir. 1990)
- Bayliss v. Barnhart, 427 F.3d 1211, 1217 (9th Cir. 2005)
- Rollins v. Massanari, 261 F.3d 853, 857 (9th Cir. 2001)
- Tommasetti v. Astrue, 533 F.3d 1035, 1038 (9th Cir. 2008)
- Smith v. Heckler, 820 F.2d 1093, 1094 (9th Cir. 1987)
- Marsh v. Colvin, 792 F.3d 1170, 1173 n.2 (9th Cir. 2015)