

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Audrey S. v. Commissioner of Social Security

Audrey S. · No. No. 24cv8035 (EP) · Decided December 29, 2025

SUMMARY

The United States District Court for the District of New Jersey denied a pro se plaintiff’s appeal from the Social Security Administration’s denial of disability insurance benefits retroactive to her alleged disability-onset date. The court held that 42 U.S.C. § 423(b) constitutionally limits retroactive disability insurance benefits to the 12 months preceding the application date and found substantial evidence supporting the determination that plaintiff’s November 4, 2019 application was her first application.

CASE DETAILS

|                       |                                                                                                                                                                                                             |
|-----------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the District of New Jersey                                                                                                                                                 |
| WRITING FOR THE COURT | Evelyn Padin                                                                                                                                                                                                |
| JURISDICTION          | United States District Court for the District of New Jersey                                                                                                                                                 |
| DECIDED               | December 29, 2025                                                                                                                                                                                           |
| DOCKET                | No. 24cv8035 (EP)                                                                                                                                                                                           |
| DISPOSITION           | other                                                                                                                                                                                                       |
| PROCEDURAL POSTURE    | Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Social Security Administration's denial of her request for disability insurance benefits retroactive to her alleged disability-onset date. |
| STANDARD OF REVIEW    | The Court reviewed legal conclusions de novo and reviewed factual findings for substantial evidence, considering the record as a whole.                                                                     |
| PRECEDENTIAL VALUE    | Unknown                                                                                                                                                                                                     |
| PARTIES               | Audrey S. v. Commissioner of Social Security                                                                                                                                                                |

TOPICS

- judicial review of agency action
- administrative law
- statutory interpretation
- due process
- equal protection

PRACTICE AREAS

- social security disability benefits
- administrative law
- constitutional law
- judicial review of agency action

## QUESTIONS PRESENTED

1. Whether 42 U.S.C. § 423(b) permits disability insurance benefits to be paid for more than twelve months before the filing of an application.
2. Whether the statutory twelve-month limitation on retroactive disability insurance benefits violates due process or equal protection.
3. Whether substantial evidence supported the ALJ's finding that Plaintiff had filed no disability insurance benefits application before November 4, 2019.

## HOLDINGS

1. Section 423(b) imposes a statutory one-year limitation on the payment of retroactive disability insurance benefits, so Plaintiff could not receive benefits for any period before November 2018 based on her November 4, 2019 application.
2. The twelve-month limitation in 42 U.S.C. § 423(b) is constitutional and does not violate due process or equal protection.
3. Substantial evidence supported the ALJ's finding that Plaintiff filed no disability insurance benefits application before November 4, 2019.

## KEY QUOTATIONS

*“the limitation on the payment of retroactive disability benefits serves as a rational means of furthering a legitimate legislative end: the preservation of the social security fund’s fiscal integrity.”* (Section III.A)

*“§ 423(b) is, “however unambiguous and cannot be construed away by this [C]ourt” given that “it is within Congress’ power to so limit the payment of retroactive benefits” and is clearly constitutional.”* (Section III.A)

## FACTUAL BACKGROUND

Plaintiff alleged that she became disabled because of a back injury on February 8, 2011, but she did not file her first disability insurance benefits application until November 4, 2019. The SSA found her disabled and awarded benefits beginning November 2018, twelve months before the filing date. Plaintiff sought retroactive payments back to her alleged onset date, but she confirmed at the administrative hearing that she had filed no earlier application.

## PROCEDURAL HISTORY

Plaintiff applied for disability insurance benefits on November 4, 2019, and the SSA awarded benefits beginning November 2018, applying the statutory twelve-month limit on retroactive benefits. After an administrative law judge rejected Plaintiff's request for payments dating to February 8, 2011, the Appeals Council denied review. Plaintiff filed this civil action, and the District Court reviewed the administrative record and denied the appeal.

## DISPOSITION

other

## CASES CITED

- Veronica D. v. Commissioner of Social Security, No. 24-1326, 2025 WL 2665313, at \*8 (M.D. Pa. Sept. 17, 2025)
- Schauddeck v. Commissioner of Social Security, 181 F.3d 429, 431 (3d Cir. 1999)
- Coup v. Heckler, 834 F.2d 313, 317 (3d Cir. 1987)
- Gisbrecht v. Barnhart, 535 U.S. 789 (2002)
- Van Horn v. Heckler, 717 F.2d 1196, 1200 (8th Cir. 1983)
- Green v. Matthews, 550 F.2d 458 (9th Cir. 1977)
- Scarbrough v. Astrue, 327 F. App'x 827, 830 (11th Cir. 2009)
- Mitchell v. Harris, 496 F. Supp. 230, 232-35 (D.N.J. 1980)
- Yeiter By & Through Yeiter v. Secretary of Health & Human Services, 818 F.2d 8, 9 (6th Cir. 1987)
- Tusson v. Bowen, 675 F. Supp. 1032, 1035 (E.D. La. 1987), *aff'd*, 847 F.2d 284 (5th Cir. 1988)
- Shepherd on Behalf of Shepherd v. Chater, 932 F. Supp. 1314, 1318 (D. Utah 1996)
- Flemming v. Nestor, 363 U.S. 603, 611 (1960)

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