

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MICHIGAN, SOUTHERN DIVISION

Stephanie L. v. Commissioner of Social Security

No. 25-cv-10350 (E.D. Mich. Feb. 26, 2026) · No. 25-cv-10350 · Decided February 26, 2026

SUMMARY

The United States District Court for the Eastern District of Michigan reviewed a denial of disability insurance benefits and supplemental security income. The court held that the administrative law judge’s evaluation of the plaintiff’s mental impairments, residual functional capacity, and medical-source opinions was supported by substantial evidence and conformed to applicable legal standards. The court denied the plaintiff’s motion for summary judgment, granted the Commissioner’s motion, and affirmed the agency decision.

CASE DETAILS

COURT	United States District Court for the Eastern District of Michigan, Southern Division
WRITING FOR THE COURT	Elizabeth A. Stafford
JURISDICTION	United States District Court for the Eastern District of Michigan, Southern Division
DECIDED	February 26, 2026
DOCKET	25-cv-10350
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying her applications for disability insurance benefits and supplemental security income. The parties consented to magistrate-judge jurisdiction and filed cross-motions for summary judgment.
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 conforms to proper legal standards. The court may not reweigh the evidence or substitute its judgment for that of the Commissioner, and considers only the evidence in the administrative record.
PRECEDENTIAL VALUE	Unpublished federal district court opinion; nonprecedential value not otherwise specified in the source.

TOPICS

judicial review of agency action

agency adjudication

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PRACTICE AREAS

Social Security disability

administrative law

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civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ adequately considered plaintiff's non-severe depression and anxiety impairments when assessing her residual functional capacity.
2. Whether substantial evidence supported the ALJ's finding that plaintiff's mental impairments were non-severe and did not require mental limitations in the RFC.
3. Whether the ALJ properly evaluated the persuasiveness of the medical opinions of Megan Monroe, OTRL, and Matthew Zamora, PA-C, under the applicable Social Security regulations.
4. Whether substantial evidence supported the ALJ's physical RFC assessment and ultimate finding that plaintiff was not disabled.

HOLDINGS

1. An ALJ adequately considers non-severe mental impairments when the decision discusses the impairments and their functional limitations and expressly considers all symptoms and the entire record in assessing the RFC, even if the RFC contains no mental limitations.
2. The ALJ's findings that plaintiff's depression and anxiety were non-severe and required no additional RFC restrictions were supported by substantial evidence.
3. The ALJ properly evaluated the opinions of Monroe and Zamora by addressing their supportability and consistency and reasonably finding them only partially persuasive.
4. The ALJ, rather than a physician, ultimately determines the claimant's RFC and may weigh medical and nonmedical evidence without improperly substituting the ALJ's judgment for medical expertise.

KEY QUOTATIONS

“The opinions are supported by explanation and consistent with the record as a whole, which documents minimal mental health complaints from the claimant, no psychiatric treatment, counseling, or emergency room visits for psychiatric complaints.” (PageID.171)

“An ALJ does not improperly assume the role of a medical expert by weighing the medical and non-medical evidence before rendering an RFC finding.” (PageID.172)

“At bottom, the ALJ’s decision is supported by substantial evidence, so the decision “must be affirmed even if the reviewing court would decide the matter differently, and even if substantial evidence also supports the opposite conclusion.”” (PageID.172)

FACTUAL BACKGROUND

The ALJ found severe impairments consisting of osteoarthritis status post right total knee arthroplasty, right peroneal nerve neuropathy, and fibromyalgia. Plaintiff also alleged depression and anxiety, but the ALJ found those impairments non-severe because they caused no more than minimal limitations and were controlled with medication without side effects. Plaintiff challenged the RFC and the ALJ's evaluation of opinions from Megan Monroe, OTRL, and Matthew Zamora, PA-C, while the record also showed ongoing work, daily activities, normal psychiatric findings, and state-agency opinions supporting a restricted range of light work.

PROCEDURAL HISTORY

An administrative law judge found that Stephanie L. had severe physical impairments but no impairment meeting or medically equaling a listed impairment. The ALJ assessed a residual functional capacity for a restricted range of light work and, relying on vocational-expert testimony, found that jobs existed in the national economy and that plaintiff was not disabled. The district court denied plaintiff's motion, granted the Commissioner's motion, and affirmed the ALJ's decision under sentence four of 42 U.S.C. § 405(g).

DISPOSITION

affirmed

CASES CITED

- Gentry v. Comm'r of Soc. Sec., 741 F.3d 708, 722 (6th Cir. 2014)
- Bass v. McMahon, 499 F.3d 506, 513 (6th Cir. 2007)
- Biestek v. Berryhill, 587 U.S. 97, 102-03 (2019)
- Hatmaker v. Comm'r of Soc. Sec., 965 F. Supp. 2d 917, 930 (E.D. Tenn. 2013)
- Cutlip v. Sec'y of Health & Hum. Servs., 25 F.3d 284, 286 (6th Cir. 1994)
- Emard v. Comm'r of Soc. Sec., 953 F.3d 844, 851-52 (6th Cir. 2020)
- Napier v. Comm'r of Soc. Sec., 127 F.4th 1000, 1007 (6th Cir. 2025)
- Higgs v. Bowen, 880 F.2d 860, 863 (6th Cir. 1988)
- Jordan v. Comm'r of Soc. Sec., 548 F.3d 417, 423 (6th Cir. 2008)
- Hardy v. Comm'r of Soc. Sec., 554 F. Supp. 3d 900, 905 (E.D. Mich. 2021)
- Hibbard v. Astrue, 537 F. Supp. 2d 867, 874 (E.D. Ky. 2008)
- Coldiron v. Comm'r of Soc. Sec., 391 F. App'x 435, 439 (6th Cir. 2010)
- Nasser v. Comm'r of Soc. Sec., 598 F. Supp. 3d 614, 633 (E.D. Mich. 2022)