

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NEW YORK

Edward M., III v. Commissioner of Social Security

Edward M., III v. Commissioner of Social Security · No. 1:25-cv-00164 (JGW) · Decided June 5, 2026

SUMMARY

The United States District Court for the Western District of New York reviewed a denial of Social Security disability insurance benefits under 42 U.S.C. § 405(g). The court held that the administrative law judge adequately addressed the vocational expert's testimony concerning reaching limitations and the Dictionary of Occupational Titles, and that the residual functional capacity was supported by substantial evidence. Plaintiff's motion for judgment on the pleadings was denied, the Commissioner's motion was granted, and the Commissioner's decision was affirmed.

CASE DETAILS

COURT	United States District Court for the Western District of New York
WRITING FOR THE COURT	J. Gregory Wehrman
JURISDICTION	United States District Court for the Western District of New York
DECIDED	June 5, 2026
DOCKET	1:25-cv-00164 (JGW)
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's denial of disability insurance benefits. The parties filed cross-motions for judgment on the pleadings under Federal Rule of Civil Procedure 12(c).
STANDARD OF REVIEW	The court reviewed whether the Commissioner's conclusions were supported by substantial evidence and based on the correct legal standard. If the evidence was susceptible to more than one rational interpretation, the Commissioner's determination was upheld.
PRECEDENTIAL VALUE	unpublished, nonprecedential district-court decision
PARTIES	Edward M., III v. Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

motion for judgment on the pleadings

disability definition

civil procedure

PRACTICE AREAS

administrative law

social security disability

civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ adequately investigated and resolved an apparent conflict between the vocational expert's testimony and the Dictionary of Occupational Titles concerning frequent reaching and the restriction against reaching at shoulder level or higher with the left arm.
2. Whether the ALJ's residual functional capacity finding was internally inconsistent because it permitted regular levels of supervision while limiting interaction with supervisors to occasional interaction.
3. Whether the Commissioner's denial of disability benefits was supported by substantial evidence.

HOLDINGS

1. The ALJ adequately resolved the apparent conflict concerning overhead reaching by specifically questioning the vocational expert about unilateral upper-extremity and reaching-plane limitations and obtaining an explanation based on the expert's training, experience, labor-market research, and familiarity with the identified jobs.
2. The RFC limitations allowing regular levels of supervision and only occasional interaction with supervisors were not inconsistent.
3. The Commissioner's decision denying benefits was supported by substantial evidence and based on the correct legal standards.

KEY QUOTATIONS

"The DOT does not directly address all non-exertional aspects of a potential RFC" (Tr. 28)

"The Court is able to glean the ALJ's reasoning from his analysis and thus finds no error requiring remand." (Tr. 28)

FACTUAL BACKGROUND

Plaintiff alleged disability based on anxiety and PTSD, degenerative arthritis affecting his left shoulder and knee, cervical spine problems, and cataracts. He testified that pain and limited use of his left arm, knee instability, difficulty concentrating, panic attacks, anger, and difficulty interacting with others prevented full-time work. The ALJ found that Plaintiff had severe physical and mental impairments but retained the residual functional capacity for a restricted range of light work with limitations on reaching, postural activities, hazards, supervision, social interaction, and work routine. Relying on vocational-expert testimony, the ALJ found that Plaintiff could perform work as a marker, housekeeper/cleaner, or routing clerk.

PROCEDURAL HISTORY

Plaintiff applied for disability insurance benefits in July 2023. After initial and reconsideration denials, he received a telephonic hearing before an administrative law judge, who issued an unfavorable decision on October 22, 2024. The Appeals Council denied review, and Plaintiff appealed to the district court. The court denied Plaintiff's motion for judgment on the pleadings, granted the Commissioner's motion, affirmed the Commissioner's decision, and directed the Clerk to close the case.

DISPOSITION

affirmed

CASES CITED

- Talavera v. Astrue, 697 F.3d 145, 151 (2d Cir. 2012)
- Moran v. Astrue, 569 F.3d 496, 501 (2d Cir. 2009)
- Williams v. Bowen, 859 F.2d 255, 258 (2d Cir. 1988)
- McIntyre v. Colvin, 758 F.3d 146, 149 (2d Cir. 2014)
- Yancey v. Apfel, 145 F.3d 106, 111 (2d Cir. 1998)
- Lockwood v. Comm'r of Soc. Sec. Admin., 914 F.3d 87 (2d Cir. 2019)
- Reilly v. Comm'r of Soc. Sec., No. 21-8-cv, 2022 WL 803316, at *2 (2d Cir. Mar. 17, 2022)
- Schillo v. Kijakazi, 31 F.4th 64, 78 (2d Cir. 2022)
- Desirae D. v. Comm'r of Soc. Sec., 20-cv-00054-JGW, 2021 WL 2042576, at *3 (W.D.N.Y. May 21, 2021)
- Tammy W. v. Comm'r of Soc. Sec., No. 22-CV-990-HKS, 2026 WL 183481, at *6 (W.D.N.Y. Jan. 23, 2026)
- Kathryn D. v. Comm'r of Soc. Sec., No. 1:22-cv-31-JJM, 2025 WL 2115487, at *4 (W.D.N.Y. July 29, 2025)
- Barbara W. v. Comm'r of Soc. Sec., No. 1:22-cv-575-TPK, 2025 WL 276668, at *6 (W.D.N.Y. Jan. 23, 2025)
- Jetaun C. R. v. Comm'r of Soc. Sec., No. 1:20-cv-1489, 2022 WL 7085513, at *4 (W.D.N.Y. Oct. 12, 2022)
- Roderick R. v. Comm'r of Soc. Sec., No. 1:21-cv-577-TPK, 2023 WL 3642035, at *1, *4-5 (W.D.N.Y. May 25, 2023)
- John C. v. Comm'r of Soc. Sec., No. 1:22-cv-00365-JGW, 2024 WL 3759753, at *1 (W.D.N.Y. Aug. 12, 2024)