

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Sonia Christine Rodriguez v. Commissioner of Social Security

Rodriguez · No. 1:21-cv-01671-CDB (SS) · Decided July 31, 2025

SUMMARY

The United States District Court for the Eastern District of California reviews the denial of Sonia Christine Rodriguez’s application for Supplemental Security Income. The court addresses alleged conflicts between vocational-expert testimony and the Dictionary of Occupational Titles, the ALJ’s duty to develop the record regarding knee arthritis, and whether the residual functional capacity determination was supported by substantial evidence. The court denies Plaintiff’s motion for summary judgment and affirms the Commissioner’s decision.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Christopher D. Baker
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	July 31, 2025
DOCKET	1:21-cv-01671-CDB (SS)
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying her Title XVI application for supplemental security income. The parties submitted cross-briefs without oral argument.
STANDARD OF REVIEW	The court reviewed the Commissioner's decision under 42 U.S.C. § 405(g) for substantial evidence and legal error. It could not substitute its judgment for the Commissioner's, was required to review the reasons provided by the ALJ, and was required to affirm where the evidence was susceptible to more than one rational interpretation unless an error was harmful.
PRECEDENTIAL VALUE	unpublished
PARTIES	Sonia Christine Rodriguez v. Commissioner of Social Security

TOPICS

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PRACTICE AREAS

Social Security disability

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QUESTIONS PRESENTED

1. Whether the ALJ failed to reconcile an apparent conflict between the vocational expert's testimony and the Dictionary of Occupational Titles concerning the mental requirements of the mail-sorter occupation.
2. Whether the ALJ failed to develop the administrative record regarding the effect of Rodriguez's bilateral knee arthritis on her ability to stand and walk.
3. Whether the ALJ properly supported the residual functional capacity assessment with substantial evidence, including evidence concerning Rodriguez's knee impairments and obesity.

HOLDINGS

1. The ALJ erred by failing to identify and reconcile the apparent conflict between Rodriguez's limitation to simple instructions and the mail-sorter occupation's Reasoning Level 3 requirements. The error was harmless because the ALJ properly identified the office-helper occupation as work Rodriguez could perform in significant numbers.
2. The ALJ was not required to further develop the record or obtain a consultative examination because the record was neither ambiguous nor inadequate for proper evaluation.
3. The ALJ properly supported the RFC with substantial evidence, including medical findings concerning Rodriguez's knees and obesity and the medical-opinion evidence.

KEY QUOTATIONS

“As such, the ALJ erred in failing to reconcile this clear conflict between the VE’s testimony and the DOT.”
(Part III.A.ii.1)

“Here, the record presents no clear gaps, nor ambiguous evidence, nor any inadequacy for allowing proper evaluation of the evidence and, therefore, did not trigger the ALJ’s duty to develop the record.” (Part III.B.ii)

“Thus, the ALJ sufficiently supported the RFC with reference to the medical record.” (Part III.C.ii)

FACTUAL BACKGROUND

Rodriguez alleged disability beginning July 27, 2017, based principally on bilateral knee degenerative joint disease, lumbar degenerative disc disease, obesity, depression, and anxiety. The ALJ found that she could perform light work with restrictions, including use of an assistive device for balance and ambulation, and determined that she could not perform past relevant work but could perform other jobs, including office helper and mail sorter. The district court found that the ALJ failed to reconcile an apparent conflict between the mail-sorter job's Reasoning Level 3 requirements and Rodriguez's limitation to simple instructions, but held the error harmless because the office-helper occupation remained available in significant numbers.

PROCEDURAL HISTORY

Rodriguez applied for supplemental security income, and the application was denied initially and on reconsideration. After a hearing, the ALJ found her not disabled; the Appeals Council denied review. The district court denied Rodriguez's motion for summary judgment, affirmed the Commissioner's decision, directed entry of judgment for Defendant, and closed the case.

DISPOSITION

affirmed

CASES CITED

- Carlos v. Comm'r of Soc. Sec., 1:21-cv-00517-SAB, 2023 WL 1159
- Andrews v. Shalala, 53 F.3d 1035, 1039 (9th Cir. 1995)
- Tommasetti v. Astrue, 533 F.3d 1035, 1038 (9th Cir. 2008)
- Shinseki v. Sanders, 556 U.S. 396, 409-10 (2009)
- Tackett v. Apfel, 180 F.3d 1094, 1098, 1101 (9th Cir. 1999)
- Beltran v. Astrue, 700 F.3d 386, 389 (9th Cir. 2012)
- Bayliss v. Barnhart, 427 F.3d 1211, 1217-18 (9th Cir. 2005)
- Massachi v. Astrue, 486 F.3d 1149, 1152-53 (9th Cir. 2007)
- Zavalin v. Colvin, 778 F.3d 842, 846-47 (9th Cir. 2015)
- Davis v. Saul, 846 F. App'x 464, 466 (9th Cir. 2021)
- Stiffler v. O'Malley, 102 F.4th 1102, 1108 n.1 (9th Cir. 2024)
- Phillips v. Kijakazi, No. 20-17178, 2021 WL 5506341
- Gutierrez v. Colvin, 844 F.3d 804, 808 (9th Cir. 2016)
- Dewey v. Colvin, 650 F. App'x 512, 514 (9th Cir. 2016)
- Lamear v. Berryhill, 865 F.3d 1201, 1205 (9th Cir. 2017)
- Pineda v. Comm'r of Soc. Sec., No. 1:22-CV-01473-SAB, 2023 WL 5917996
- Haines v. Berryhill, No. ED CV 17-1810-DFM, 2019 WL 430498
- Gutierrez v. Comm'r of Soc. Sec., 740 F.3d 519, 528 (9th Cir. 2014)
- Connolly v. Colvin, No. 1:15-CV-718-BAM, 2016 WL 8730722
- Hernandez v. Berryhill, 707 F. App'x 456, 458-59 (9th Cir. 2017)
- Smolen v. Chater, 80 F.3d 1273, 1288-89 (9th Cir. 1996)
- Celaya v. Halter, 332 F.3d 1177, 1183 (9th Cir. 2003)
- Brown v. Heckler, 713 F.2d 441, 443 (9th Cir. 1983)
- Schiaffino v. Saul, 799 F. App'x 473, 476 (9th Cir. 2020)
- Sims v. Apfel, 530 U.S. 103, 111-12 (2000)
- Kaur v. Kijakazi, No. 1:22-cv-0697 JLT CDB, 2023 WL 6241821
- Harrison v. Saul, No. 1:19-cv-01683-BAM, 2021 WL 1173024

- Shaibi v. Berryhill, 883 F.3d 1102, 1109 (9th Cir. 2017)
- Meanel v. Apfel, 172 F.3d 1111 (9th Cir. 1999), amended June 22, 1999
- Caratachea v. Comm'r of Soc. Sec., No. 1:21-cv-00804-DAD-BAM, 2025 WL 1548682
- Howard ex rel. Wolff v. Barnhart, 341 F.3d 1006, 1012 (9th Cir. 2003)
- Owen v. Saul, 808 F. App'x 421, 423 (9th Cir. 2020)
- Sanchez v. Comm'r of Soc. Sec., No. 1:22-cv-00091-SAB, 2023 WL 2354750
- Turner v. Comm'r of Soc. Sec., 613 F.3d 1217, 1222-23 (9th Cir. 2010)
- Vertigan v. Halter, 260 F.3d 1044, 1049 (9th Cir. 2001)
- Bagby v. Comm'r Soc. Sec., 606 F. App'x 888, 890 (9th Cir. 2015)
- Stubbs-Danielson v. Astrue, 539 F.3d 1169, 1173-74 (9th Cir. 2008)
- Orn v. Astrue, 495 F.3d 625, 630 (9th Cir. 2007)
- Gish v. Colvin, No. 6:14-cv-01938-SI, 2016 WL 814816
- Montoya v. Kijakazi, No. 1:20-cv-0152 JLT, 2021 WL 5356470
- Independent Towers of Washington v. Washington, 350 F.3d 925, 929 (9th Cir. 2003)
- Compton v. Colvin, No. 2:11-CV-1824 EFB, 2013 WL 1326034

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