

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
WASHINGTON

Amanda W. v. Commissioner of Social Security

Amanda W. · No. 3:25-cv-05396-DWC · Decided January 7, 2026

SUMMARY

The United States District Court for the Western District of Washington reviewed the denial of Amanda W.'s application for Supplemental Security Income benefits under 42 U.S.C. § 405(g). The court held that the Administrative Law Judge properly evaluated the medical opinions, subjective symptom testimony, and lay witness statements, and found no reversible error. The court affirmed the Commissioner's decision denying benefits.

CASE DETAILS

COURT	United States District Court for the Western District of Washington
WRITING FOR THE COURT	David W. Christel
JURISDICTION	United States District Court for the Western District of Washington
DECIDED	January 7, 2026
DOCKET	3:25-cv-05396-DWC
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying her application for Supplemental Security Income benefits.
STANDARD OF REVIEW	Under 42 U.S.C. § 405(g), the Court may set aside the Commissioner's denial of benefits only if the ALJ's findings are based on legal error or are not supported by substantial evidence in the record as a whole.
PRECEDENTIAL VALUE	Unknown; district court order with no reporter citation
PARTIES	Amanda W. v. Commissioner of Social Security

TOPICS

- judicial review of agency action
- administrative law
- disability definition

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the ALJ properly evaluated the medical opinion evidence under the applicable post-2017 regulations.
2. Whether the ALJ gave legally sufficient reasons for discounting Plaintiff's subjective symptom testimony.
3. Whether the ALJ properly evaluated statements from Plaintiff's family members and caregiver.
4. Whether any errors in evaluating the evidence required reversal or remand.

HOLDINGS

1. The ALJ properly evaluated the medical opinion evidence and did not err by finding certain opinions unpersuasive or by declining to treat descriptions of impairments as medical opinions.
2. The ALJ provided legally sufficient reasons for discounting Plaintiff's subjective symptom testimony concerning seizures, flashbacks, and panic attacks.
3. The ALJ adequately evaluated the lay witness statements, and any error in addressing portions of those statements was harmless.

KEY QUOTATIONS

“After considering the record, the Court finds no reversible error and affirms the Commissioner’s decision to deny benefits.” (at 1)

“For applications, like Plaintiff’s, filed after March 27, 2017, ALJs need not “defer or give any specific evidentiary weight, including controlling weight, to” particular medical opinions” (at 2)

“Where (as is the case here) the ALJ finds Plaintiff has presented evidence of one or more impairments which could be reasonably expected to cause her alleged symptoms and there is no affirmative evidence of malingering, the ALJ must give specific, clear, and convincing reasons for discounting Plaintiff’s testimony.” (at 5)

FACTUAL BACKGROUND

Plaintiff applied for Supplemental Security Income and alleged disabling limitations from seizures, PTSD symptoms, panic attacks, and related impairments. After a second administrative hearing, the ALJ found Plaintiff not disabled and evaluated medical opinions, subjective symptom testimony, and lay witness statements. The record included evidence of medication and treatment noncompliance, limited corroboration of the alleged frequency and severity of seizures, and a lack of treatment for alleged flashbacks and panic attacks.

PROCEDURAL HISTORY

Plaintiff applied for SSI in 2019 and received an unfavorable ALJ decision after a 2021 hearing. This Court previously reversed that decision pursuant to the parties' stipulation. Following a second hearing in February

2024, the ALJ again found Plaintiff not disabled, and the Appeals Council declined to consider Plaintiff's exceptions. Plaintiff filed this action on May 13, 2025, and the Court affirmed the Commissioner's decision.

DISPOSITION

affirmed

CASES CITED

- Bayliss v. Barnhart, 427 F.3d 1211, 1214 n.1 (9th Cir. 2005)
- Tidwell v. Apfel, 161 F.3d 599, 601 (9th Cir. 1998)
- Woods v. Kijakazi, 32 F.4th 785, 791 (9th Cir. 2022)
- Carmickle v. Commissioner, Social Security Administration, 533 F.3d 1155, 1161 n.2, 1165 (9th Cir. 2008)
- Paladin Associates, Inc. v. Montana Power Co., 328 F.3d 1145, 1164 (9th Cir. 2003)
- Elsey v. Saul, 782 F. App'x 636, 637 (9th Cir. 2019)
- Andrews v. Shalala, 53 F.3d 1035, 1041 (9th Cir. 1995)
- Garrison v. Colvin, 759 F.3d 995, 1014-15 (9th Cir. 2014)
- Smolen v. Chater, 80 F.3d 1273, 1281 (9th Cir. 1996)
- Molina v. Astrue, 674 F.3d 1104, 1112, 1116-22 (9th Cir. 2012)
- Burch v. Barnhart, 400 F.3d 676, 681 (9th Cir. 2005)
- Parra v. Astrue, 481 F.3d 742, 751 (9th Cir. 2007)
- Johnson v. Shalala, 60 F.3d 1428, 1434 (9th Cir. 1995)
- Dodrill v. Shalala, 12 F.3d 915, 919 (9th Cir. 1993)
- Rhea L. v. Commissioner of Social Security, No. 2:24-CV-870, 2024 WL 5244402, at *4-5 (W.D. Wash. Dec. 30, 2024)