

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
WASHINGTON

Kristina M. v. Commissioner of Social Security

Kristina M. · No. C25-5412-SKV · Decided January 28, 2026

SUMMARY

The United States District Court for the Western District of Washington affirmed the Commissioner of Social Security’s denial of the plaintiff’s applications for SSI, DIB, and Childhood Disability Benefits. The court held that the ALJ did not commit harmful error in assessing the plaintiff’s residual functional capacity or in declining to include additional limitations related to migraine frequency and workplace attendance, and dismissed the case with prejudice.

CASE DETAILS

COURT	United States District Court for the Western District of Washington
WRITING FOR THE COURT	S. Kate Vaughan
JURISDICTION	United States District Court for the Western District of Washington
DECIDED	January 28, 2026
DOCKET	C25-5412-SKV
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 Supplemental Security Income, Disability Insurance Benefits, and Childhood Disability Benefits.
STANDARD OF REVIEW	Under 42 U.S.C. § 405(g), the court may set aside the Commissioner's decision only if the ALJ's findings are based on harmful legal error or are unsupported by substantial evidence. The court reviews the record as a whole, may not reweigh the evidence or substitute its judgment for the Commissioner's, and treats an error as harmless when it is inconsequential to the ultimate nondisability determination.
PRECEDENTIAL VALUE	unpublished, nonprecedential
PARTIES	Kristina M. v. Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

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PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ erred in assessing Plaintiff's residual functional capacity by failing to include additional limitations allegedly caused by migraine headaches, including limitations on attendance.
2. Whether the Commissioner's final decision was supported by substantial evidence and free of harmful legal error.

HOLDINGS

1. The ALJ did not err by declining to include additional migraine-related limitations in the RFC because Plaintiff did not identify record-supported limitations independent of subjective symptom reports that the ALJ had properly discounted.
2. The court declined to consider the argument because it was raised for the first time in Plaintiff's reply brief and, alternatively, held that Plaintiff identified no persuasive authority requiring the ALJ to make a separate finding regarding migraine frequency.
3. The Commissioner's final decision denying benefits was affirmed because Plaintiff failed to demonstrate harmful legal error or a lack of substantial evidence.

KEY QUOTATIONS

"The Court looks to "the record as a whole to determine whether the error alters the outcome of the case.""
(at 2)

"When the evidence is susceptible to more than one rational interpretation, it is the Commissioner's conclusion that must be upheld." (at 2)

"Fundamentally, Plaintiff asks for a different weighing of the evidence from that conducted by the ALJ." (at 5)

FACTUAL BACKGROUND

Plaintiff, born in 1999, had a college education, no past relevant work, and was last gainfully employed in 2019. She applied for SSI, DIB, and Childhood Disability Benefits, alleging disability based primarily on migraine headaches. The ALJ found migraines to be a severe impairment but determined that Plaintiff retained the capacity for a restricted range of light work and could perform jobs existing in significant numbers in the national economy. Plaintiff argued that the RFC failed to account for disabling migraines and their effect on work attendance.

PROCEDURAL HISTORY

Plaintiff applied for benefits alleging disability beginning June 19, 2019. After an initial denial, reconsideration, an administrative hearing, and an Appeals Council remand for further evaluation, the ALJ held a second hearing

and again found Plaintiff not disabled. The Appeals Council denied review, making the ALJ's decision final, and Plaintiff appealed to the district court. The court affirmed the Commissioner's decision and dismissed the case with prejudice.

DISPOSITION

affirmed

CASES CITED

- Bayliss v. Barnhart, 427 F.3d 1211, 1214 (9th Cir. 2005)
- Molina v. Astrue, 674 F.3d 1104, 1115 (9th Cir. 2012)
- Biestek v. Berryhill, 587 U.S. 97, 103 (2019)
- Magallanes v. Bowen, 881 F.2d 747, 750 (9th Cir. 1989)
- Andrews v. Shalala, 53 F.3d 1035, 1039 (9th Cir. 1995)
- Thomas v. Barnhart, 278 F.3d 947, 954 (9th Cir. 2002)
- Robbins v. Social Security Administration, 466 F.3d 880, 886 (9th Cir. 2006)
- Indep. Towers of Wash. v. Washington, 350 F.3d 925, 929 (9th Cir. 2003)
- Britton v. Colvin, 787 F.3d 1011, 1013-14 (9th Cir. 2015)
- Armfield v. Kijakazi, 2023 WL 2728817, at *2 n.1 (9th Cir. Mar. 31, 2023)
- Lovisa V.W. v. Commissioner of Social Security, 2021 WL 2185695, at *2 (W.D. Wash. May 28, 2021)
- Rounds v. Commissioner Social Security Administration, 807 F.3d 996, 1006 (9th Cir. 2015)