

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF OREGON

Jamie M. v. Commissioner Social Security Administration

Jamie M. v. Commissioner of Social Security Administration, Case No. 3:25-cv-00639-AR (D. Or. June 5, 2026)
· No. 3:25-cv-00639-AR · Decided June 5, 2026

SUMMARY

The United States District Court for the District of Oregon reversed the Commissioner of Social Security’s decision denying Jamie M. disability benefits. The court held that the Administrative Law Judge inadequately evaluated the supportability and consistency of medical opinions from Margaret Burkes, Shalmahesen Lester, and Joseph Resendiz. The case was remanded for further administrative proceedings, including reevaluation of the medical opinions and, as warranted, the claimant’s residual functional capacity.

CASE DETAILS

COURT	United States District Court for the District of Oregon
WRITING FOR THE COURT	Jeff Armistead
JURISDICTION	United States District Court for the District of Oregon
DECIDED	June 5, 2026
DOCKET	3:25-cv-00639-AR
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review of the Commissioner of Social Security's final decision denying disability benefits. The court reviewed the Administrative Law Judge's evaluation of medical opinions under the substantial-evidence and proper-legal-standards framework.
STANDARD OF REVIEW	The court must affirm the Commissioner's decision if the Commissioner applied proper legal standards and the findings are supported by substantial evidence.
PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	Jamie M. v. Commissioner, Social Security Administration

TOPICS

- judicial review of agency action
- administrative law
- agency adjudication
- ada / disability

PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ adequately evaluated Margaret Burkes's medical opinion under the supportability and consistency requirements.
2. Whether the ALJ adequately evaluated Shalmahesen Lester's medical opinion under the supportability and consistency requirements.
3. Whether substantial evidence supported the ALJ's finding that Joseph Resendiz's reaching limitations were based primarily on Jamie M.'s self-report rather than objective examination findings.
4. Whether the errors in evaluating the medical opinions required remand for further administrative proceedings or an immediate award of benefits.

HOLDINGS

1. The ALJ erred in finding Burkes's opinion unpersuasive because the ALJ failed to explain how Jamie M.'s minimal daily activities were inconsistent with the severe mental limitations described by Burkes, improperly considered medical examinations without relevant context, and failed to make adequate findings concerning supportability.
2. The ALJ erred in evaluating Lester's opinion because the ALJ relied on daily activities and normal status examinations without substantial-evidence support and failed to address the opinion's supportability.
3. The ALJ's finding that Resendiz's reaching limitations were based on Jamie M.'s self-report rather than objective medical evidence was not supported by substantial evidence.
4. Remand for further administrative proceedings, rather than an immediate award of benefits, was appropriate because the errors could affect the remaining sequential-evaluation steps and the residual functional capacity determination, and outstanding issues remained regarding disability.

KEY QUOTATIONS

“The fundamental human need for interpersonal connection with loved ones and negligible efforts at taking care of oneself despite one’s mental health conditions are insufficient to support a disability determination”
(at 2)

“On remand, the ALJ will reevaluate the medical opinions of Burkes, Lester, and Resendiz addressing their supportability and consistency with the record.” (at 5)

FACTUAL BACKGROUND

Jamie M. alleged mental impairments including severe anxiety, depression, and agoraphobia with panic disorder, as well as physical limitations involving her shoulder and range of motion. The ALJ discounted medical-source statements from naturopathic doctor Margaret Burkes, counselor Shalmahesen Lester, and physician Joseph Resendiz, relying in part on Jamie M.'s activities of daily living, normal status examinations, and perceived lack

of objective support. The district court concluded that the ALJ failed to adequately explain the consistency and supportability findings concerning each opinion.

PROCEDURAL HISTORY

The Administrative Law Judge denied Jamie M.'s application for disability benefits. Jamie M. challenged the decision, arguing that the ALJ improperly evaluated the opinions of Margaret Burkes, Shalmahesen Lester, and Joseph Resendiz. The district court reversed the Commissioner's decision and remanded for further administrative proceedings.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The ALJ must reevaluate the medical opinions of Burkes, Lester, and Resendiz, including their supportability and consistency with the record. As warranted, the ALJ must reevaluate Jamie M.'s residual functional capacity, obtain supplemental vocational-expert evidence, and conduct any other reasonable measures necessary.

CASES CITED

- Kitchen v. Kijakazi, 82 F.4th 732, 738 (9th Cir. 2023)
- Lambert v. Saul, 980 F.3d 1266, 1270 (9th Cir. 2020)
- Woods v. Kijakazi, 32 F.4th 785, 792 (9th Cir. 2022)
- Ford v. Saul, 950 F.3d 1141, 1155 (9th Cir. 2020)
- Reddick v. Chater, 157 F.3d 715, 722 (9th Cir. 1998)
- Cooper v. Bowen, 815 F.2d 557, 561 (9th Cir. 1987)
- Ghanim v. Colvin, 763 F.3d 1154, 1164 (9th Cir. 2014)
- Dominguez v. Colvin, 808 F.3d 403, 407-08 (9th Cir. 2015)
- Treichler v. Commissioner of Social Security Administration, 775 F.3d 1090, 1099 (9th Cir. 2014)
- Garrison v. Colvin, 759 F.3d 995, 1019 (9th Cir. 2014)