

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Jonathan T. Baldwin v. Commissioner of Social Security

Case No. 1:23-cv-1719 JLT EPG (E.D. Cal. Mar. 10, 2025) · No. 1:23-cv-1719 JLT EPG · Decided March 11,
2025

SUMMARY

The United States District Court for the Eastern District of California reviewed the denial of Jonathan T. Baldwin’s application for supplemental security income under Title XVI of the Social Security Act. The court declined to adopt the magistrate judge’s recommendation for remand, denied Baldwin’s appeal, and affirmed the Commissioner’s administrative decision, concluding that the administrative law judge provided sufficient reasons for evaluating Baldwin’s subjective symptom statements.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Jennifer L. Thurston
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	March 11, 2025
DOCKET	1:23-cv-1719 JLT EPG
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review of the Commissioner's final decision denying his application for supplemental security income. After the magistrate judge recommended reversal and remand, the Commissioner objected and the plaintiff responded. The district court conducted de novo review of the challenged findings and recommendations.
STANDARD OF REVIEW	Under 28 U.S.C. § 636(b)(1), the district court conducts de novo review of portions of a magistrate judge's findings and recommendations to which objections are made. The administrative decision is upheld when it applies proper legal standards and is supported by substantial evidence.
PRECEDENTIAL VALUE	unpublished
PARTIES	Jonathan T. Baldwin v. Commissioner of Social Security

TOPICS

judicial review of agency action

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PRACTICE AREAS

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judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ provided legally sufficient clear and convincing reasons for discounting Baldwin's subjective symptom statements.
2. Whether the ALJ properly considered Baldwin's daily activities in evaluating the severity of his alleged symptoms.
3. Whether the ALJ adequately linked the medical evidence to the subjective statements it found inconsistent with the record.
4. Whether any deficiency in the ALJ's evaluation of the objective medical evidence was harmless in light of the other reasons supporting the symptom evaluation.
5. Whether the magistrate judge's recommendation to reverse and remand should be adopted.

HOLDINGS

1. The ALJ did not commit reversible error by using boilerplate language because the decision went on to identify and discuss several specific factors supporting the evaluation of Baldwin's subjective statements.
2. The ALJ properly considered Baldwin's relatively intact daily activities, including personal care, meal preparation, household chores, moving furniture, gym attendance, and water aerobics, as a clear and convincing reason to give less weight to his statements concerning the severity of his symptoms.
3. The ALJ sufficiently linked Baldwin's subjective statements to medical evidence by identifying treatment records showing effective treatment, good mood, better sleep, stable appetite, and stable concentration when Baldwin complied with prescribed medication.
4. The ALJ properly considered Baldwin's conservative treatment, efforts to find work, and ability to focus during the hearing as additional reasons supporting the conclusion that his subjective complaints were not as severe as alleged.
5. Any possible lack of specificity in the ALJ's discussion of the objective medical evidence was harmless because the ALJ provided several additional, valid, and record-supported reasons for discounting Baldwin's subjective statements.

KEY QUOTATIONS

“Even where ... activities suggest some difficulty functioning, they may be grounds for discrediting the claimant’s testimony to the extent that they contradict claims of a totally debilitating impairment.” (Section V.C)

“Unless the ALJ links the claimant’s testimony to “the observations an ALJ makes as part of the summary of the medical record,” the summary is not sufficient to reject a claimant’s subjective statements.” (Section V.D)

“Having carefully reviewed the entire matter, the Court finds the ALJ applied proper legal standards and substantial evidence supports the administrative decision.” (Conclusion and Order)

FACTUAL BACKGROUND

Baldwin applied for supplemental security income alleging disabling symptoms associated principally with schizoaffective disorder and severe bilateral flatfoot and skew foot deformities. The ALJ found severe impairments but determined that Baldwin retained the residual functional capacity for medium work with postural, mental, and social limitations. In evaluating his subjective statements, the ALJ considered his daily activities, exercise, conservative treatment, efforts to work, hearing observations, and the medical evidence.

PROCEDURAL HISTORY

The administrative law judge applied the five-step sequential evaluation and determined that Baldwin was not disabled because he could perform medium work subject to specified limitations and could perform jobs existing in significant numbers in the national economy. The magistrate judge found that the ALJ had not provided clear and convincing reasons for discounting Baldwin's subjective complaints and recommended reversal and remand. The district court declined to adopt the findings and recommendations, denied Baldwin's motion for summary judgment, granted the Commissioner's request to affirm, directed entry of judgment for the Commissioner, and closed the case.

DISPOSITION

affirmed

CASES CITED

- Lambert v. Saul, 980 F.3d 1266, 1277 (9th Cir. 2020)
- Brown-Hunter v. Colvin, 806 F.3d 487, 493-94 (9th Cir. 2015)
- Lingenfelter v. Astrue, 504 F.3d 1028, 1035-36 (9th Cir. 2007)
- Bunnell v. Sullivan, 947 F.2d 341, 344 (9th Cir. 1991)
- Fair v. Bowen, 885 F.2d 597, 603 (9th Cir. 1989)
- Thomas v. Barnhart, 278 F.3d 947, 958-59 (9th Cir. 2002)
- Valentine v. Commissioner of Social Security Administration, 574 F.3d 685, 693 (9th Cir. 2009)
- Stubbs-Danielson v. Astrue, 539 F.3d 1169, 1175 (9th Cir. 2008)
- Curry v. Sullivan, 925 F.2d 1127, 1130 (9th Cir. 1991)
- Burch v. Barnhart, 400 F.3d 676, 680-81 (9th Cir. 2005)
- Magallanes v. Bowen, 881 F.2d 747, 750 (9th Cir. 1989)
- Morgan v. Commissioner of the Social Security Administration, 169 F.3d 595, 600 (9th Cir. 1999)
- Rollins v. Massanari, 261 F.3d 853, 857 (9th Cir. 2001)

- *Holohan v. Massanari*, 246 F.3d 1195, 1208 (9th Cir. 2001)
- *Greger v. Barnhart*, 464 F.3d 968, 972 (9th Cir. 2006)
- *Argueta v. Colvin*, 2016 WL 4138577, at *13 (E.D. Cal. Aug. 3, 2016)
- *Holcomb v. Saul*, 832 F. App'x 505, 506 (9th Cir. Dec. 28, 2020)
- *Meanel v. Apfel*, 172 F.3d 1111, 1114 (9th Cir. 1999)
- *Ghanim v. Colvin*, 763 F.3d 1154, 1165 (9th Cir. 2014)
- *Bray v. Commissioner of Social Security Administration*, 554 F.3d 1219, 1227 (9th Cir. 2009)
- *Nyman v. Heckler*, 779 F.2d 528, 531 (9th Cir. 1985)
- *Drouin v. Sullivan*, 966 F.2d 1255, 1258-59 (9th Cir. 1992)
- *Molina v. Astrue*, 674 F.3d 1104, 1115 (9th Cir. 2012)
- *Moisa v. Barnhart*, 367 F.3d 882, 885 (9th Cir. 2004)
- *Smartt v. Kijakazi*, 53 F.4th 489, 494, 499 (9th Cir. 2022)
- *Elliott v. Astrue*, 2012 WL 3818288, at *5 (D. Or. Sept. 4, 2012)
- *Glendenning v. Kijakazi*, No. 22-35391, 2023 WL 3479564, at *1 (9th Cir. May 16, 2023)
- *Dawson v. Marshall*, 561 F.3d 930, 932 (9th Cir. 2009)