

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NEW YORK

Joseph Y. v. Commissioner of Social Security

Joseph Y. · No. 6:24-cv-06265-FPG · Decided March 25, 2026

SUMMARY

The United States District Court for the Western District of New York reviewed the Commissioner of Social Security’s denial of Joseph Y.’s applications for disabled child’s insurance benefits and Supplemental Security Income. The court held that the ALJ’s residual functional capacity determination was supported by substantial evidence, denied the plaintiff’s motion for judgment on the pleadings, granted the Commissioner’s motion, and dismissed the complaint with prejudice.

CASE DETAILS

COURT	United States District Court for the Western District of New York
JURISDICTION	United States District Court for the Western District of New York
DECIDED	March 25, 2026
DOCKET	6:24-cv-06265-FPG
DISPOSITION	dismissed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying disability-based child’s insurance benefits and Supplemental Security Income. Both parties moved for judgment on the pleadings under Federal Rule of Civil Procedure 12(c).
STANDARD OF REVIEW	The court reviews the Commissioner's final decision to determine whether it is supported by substantial evidence and based on the correct legal standard. The court does not conduct a de novo disability determination.
PRECEDENTIAL VALUE	unpublished, nonprecedential
PARTIES	Joseph Y. v. Commissioner of Social Security

TOPICS

- motion for judgment on the pleadings
- judicial review of agency action
- administrative law
- ada / disability
- civil procedure

PRACTICE AREAS

Social Security disability

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ erred by failing to include a limitation concerning interaction with supervisors in the RFC.
2. Whether the ALJ improperly substituted lay judgment for medical opinion in determining Plaintiff's RFC.
3. Whether the ALJ failed to consider Plaintiff's testimony, educational records, or vocational-expert testimony concerning difficulty interacting with supervisors.

HOLDINGS

1. The ALJ did not err by omitting a limitation on interaction with supervisors because the decision sufficiently showed that the ALJ found no such limitation supported by the record.
2. The ALJ did not substitute lay judgment for medical expertise when formulating Plaintiff's RFC.
3. The ALJ did not err by failing to discuss vocational-expert testimony concerning a hypothetical limitation involving supervisors because the ALJ determined, with substantial-evidence support, that Plaintiff had no such limitation.

KEY QUOTATIONS

“In reviewing a final decision of the SSA, this Court is limited to determining whether the SSA’s conclusions were supported by substantial evidence in the record and were based on a correct legal standard.”

“Substantial evidence means more than a mere scintilla. It means such relevant evidence as a reasonable mind might accept as adequate to support a conclusion.”

“The complaint is DISMISSED WITH PREJUDICE, and the Clerk of Court is directed to enter judgment and close this case.”

FACTUAL BACKGROUND

Plaintiff applied for child’s insurance benefits based on disability and Supplemental Security Income, alleging disability beginning November 5, 2021. The ALJ found severe depressive, anxiety, neurocognitive, asthma, and migraine-related impairments, but determined that none met or medically equaled a listed impairment. The ALJ assigned an RFC for work at all exertional levels with some nonexertional limitations, including occasional interaction with the public and coworkers, but no limitation in interacting with supervisors, and found that jobs existed in significant numbers that Plaintiff could perform.

PROCEDURAL HISTORY

The Administrative Law Judge denied Plaintiff's applications after a telephone hearing, finding that Plaintiff was not disabled under the Social Security Act. The Appeals Council denied review. The district court denied

Plaintiff's motion for judgment on the pleadings, granted the Commissioner's motion, and dismissed the complaint with prejudice.

DISPOSITION

dismissed

CASES CITED

- Talavera v. Astrue, 697 F.3d 145, 151 (2d Cir. 2012)
- Moran v. Astrue, 569 F.3d 108, 112 (2d Cir. 2009)
- Schaal v. Apfel, 134 F.3d 496, 501 (2d Cir. 1998)
- Wagner v. Secretary of Health & Human Services, 906 F.2d 856, 860 (2d Cir. 1990)
- Bowen v. City of New York, 476 U.S. 467, 470-71 (1986)
- Chico v. Schweiker, 710 F.2d 947, 948 (2d Cir. 1983)
- Rosa v. Callahan, 168 F.3d 72, 77 (2d Cir. 1999)
- Matta v. Astrue, 508 F. App'x 53, 56 (2d Cir. 2013)
- Cichocki v. Astrue, 729 F.3d 172, 177-78 & n.3 (2d Cir. 2013)
- Mongeur v. Heckler, 722 F.2d 1033, 1040 (2d Cir. 1983)
- Mowry v. Commissioner of Social Security, No. 18-CV-6108, 2019 WL 4643595, at *3 (W.D.N.Y. Sept. 24, 2019)
- Jiminez v. Colvin, No. 16-CV-6350, 2018 WL 459301, at *3 (W.D.N.Y. Jan. 18, 2018)
- Brault v. Social Security Administration, Commissioner, 683 F.3d 443, 448 (2d Cir. 2012)
- Gonzalez-Cruz v. Commissioner of Social Security, 294 F. Supp. 3d 164, 187 (W.D.N.Y. 2018)