

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
OHIO, EASTERN DIVISION

Michael Sean Cronican v. Commissioner of Social Security

Cronican · No. 1:25-CV-638 · Decided December 22, 2025

SUMMARY

This Report and Recommendation addresses Michael Sean Cronican’s appeal from the denial of his application for Social Security Disability Insurance benefits. The magistrate judge recommends reversing the Commissioner’s decision and remanding for further proceedings because the ALJ did not adequately consider or explain whether Cronican required a bariatric chair and the effect of that limitation on available work. The recommendation does not reach Cronican’s second assignment of error concerning the evaluation of his symptom allegations.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio, Eastern Division
WRITING FOR THE COURT	Jennifer Dowdell Armstrong; Christopher A. Boyko
JURISDICTION	United States District Court for the Northern District of Ohio, Eastern Division
DECIDED	December 22, 2025
DOCKET	1:25-CV-638
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Report and recommendation on judicial review of a final Social Security Administration decision denying disability insurance benefits.
STANDARD OF REVIEW	The court reviews whether the Commissioner's decision is supported by substantial evidence and made under proper legal standards. The court also requires the ALJ to build an accurate and logical bridge between the evidence and the result.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Michael Sean Cronican v. Commissioner of Social Security

TOPICS

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

PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ's residual functional capacity assessment was supported by substantial evidence when it failed to address whether Cronican's weight required use of a bariatric chair.
2. Whether the ALJ properly evaluated Cronican's symptom allegations under the applicable regulations and case law.

HOLDINGS

1. The ALJ erred by failing to explain whether Cronican's approximately 500-pound weight required a bariatric chair and, if so, what effect that limitation would have on the jobs available to him. The matter should be reversed and remanded for further consideration.
2. The court did not reach the second assignment of error because the first assignment independently required remand.

KEY QUOTATIONS

"Does it take an expert's opinion to know that a 500-pound man cannot use a chair that is only able to hold a 300-pound man? No, it does not." (Analysis section V.C.)

"Because the ALJ did not mention this evidence or address the issue of whether Mr. Cronican needs a bariatric chair, this is a situation where the Court cannot determine if the evidence was discounted or merely overlooked." (Analysis section V.C.)

"Applying common sense, Mr. Cronican cannot use a standard work chair." (Analysis section V.C.)

FACTUAL BACKGROUND

Cronican alleged disability based principally on morbid obesity, lumbar degenerative disc disease, osteoarthritis, anxiety, and depression. He consistently weighed approximately 470 to 500 pounds during the relevant period, and he testified that he could not sit for extended periods in ordinary chairs. At the administrative hearing, the vocational expert testified that a standard office chair supports up to 300 pounds and that a heavy-duty chair supporting up to 500 pounds would be an accommodation. The ALJ found morbid obesity to be a severe impairment and limited Cronican to light work with four hours of standing or walking, but did not address whether his weight required a bariatric chair or how such a requirement would affect available jobs.

PROCEDURAL HISTORY

Cronican applied for a period of disability and Disability Insurance Benefits, and the Social Security Administration denied the claim initially and on reconsideration. After an administrative hearing, the ALJ found that Cronican was not disabled; the Appeals Council denied review, making the ALJ's decision final. Cronican filed this action under 42 U.S.C. § 405(g), and the magistrate judge recommended reversal and remand for further proceedings.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Commissioner should further consider and explain whether Cronican requires a bariatric chair and, if so, the effect of that limitation on the jobs available to him. The vocational analysis should address whether employers commonly provide such an accommodation and whether the number of available jobs would be reduced.

CASES CITED

- Olive v. Commissioner of Social Security, No. 3:06 CV 1597, 2007 WL 5403416, at *2 (N.D. Ohio Sept. 19, 2007)
- Abbott v. Sullivan, 905 F.2d 918, 922–23 (6th Cir. 1990)
- Mullen v. Bowen, 800 F.2d 535, 538 (6th Cir. 1986) (en banc)
- Winn v. Commissioner of Social Security, 615 F. App'x 315, 320 (6th Cir. 2015)
- Cole v. Astrue, 661 F.3d 931, 937 (6th Cir. 2011)
- Biestek v. Berryhill, 587 U.S. 97, 102 (2019)
- Consolidated Edison Co. v. NLRB, 305 U.S. 197, 229 (1938)
- White v. Commissioner of Social Security, 572 F.3d 272, 281 (6th Cir. 2009)
- Bowen v. Commissioner of Social Security, 478 F.3d 742, 746 (6th Cir. 2007)
- Fleischer v. Astrue, 774 F. Supp. 2d 875, 877 (N.D. Ohio 2011)
- Sarchet v. Chater, 78 F.3d 305, 307 (7th Cir. 1996)
- Golden v. Berryhill, No. 1:18CV00636, 2018 WL 7079506, at *17 (N.D. Ohio Dec. 12, 2018), report and recommendation adopted sub nom., 2019 WL 415250 (N.D. Ohio Feb. 1, 2019)
- Rudd v. Commissioner of Social Security, 531 F. App'x 719, 728 (6th Cir. 2013)
- Lipanye v. Commissioner of Social Security, 802 F. App'x 165, 170 (6th Cir. 2020)
- Casey v. Secretary of Health & Human Services, 987 F.2d 1230, 1235 (6th Cir. 1993)
- Jordan v. Commissioner of Social Security, No. 5:25-cv-964-JRA, 2025 WL 3237489, at *10–12 (N.D. Ohio Nov. 20, 2025)
- Innocent v. Saul, No. 1:18-CV-2391, 2020 WL 1031531, at *11 (N.D. Ohio Mar. 3, 2020)
- Holcomb v. Commissioner of Social Security, No. 1:18-CV-191, 2019 WL 1102250, at *10–11 (N.D. Ohio Jan. 14, 2019)
- Higgins v. Commissioner, 898 F.3d 793, 796 (8th Cir. 2018)
- Strader v. Commissioner of Social Security, No. 5:22-CV-367-M-BM, 2024 WL 796523, at *10 (E.D.N.C. Feb. 2, 2024)
- Buckhannon ex rel. J.H. v. Astrue, 368 F. App'x 674, 678–79 (6th Cir. 2010)
- Berkshire v. Dahl, 928 F.3d 520, 530 (6th Cir. 2019)
- Howard v. Secretary of Health & Human Services, 932 F.2d 505, 509 (6th Cir. 1991)

- Overholt v. Green, No. 1:17-CV-00186, 2018 WL 3018175, at *2 (W.D. Ky. June 15, 2018)
- United States v. Wandahsega, 924 F.3d 868, 878–79 (6th Cir. 2019)

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