

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
MICHIGAN

Toni S. v. Commissioner of Social Security

Toni S. v. Commissioner of Social Security · No. 1:25-cv-00314 · Decided February 13, 2026

SUMMARY

The United States District Court for the Western District of Michigan reviewed an appeal from the denial of Plaintiff’s application for Supplemental Security Income. The court held that the ALJ failed to adequately explain the evidentiary basis for the residual functional capacity limitation allowing a sit/stand option and failed to address Plaintiff’s alleged need to lie down during the day. The court reversed the ALJ’s decision and remanded the matter for further consideration.

CASE DETAILS

COURT	United States District Court for the Western District of Michigan
WRITING FOR THE COURT	Maarten Vermaat
JURISDICTION	United States District Court for the Western District of Michigan
DECIDED	February 13, 2026
DOCKET	1:25-cv-00314
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of an administrative denial of Supplemental Security Income benefits.
STANDARD OF REVIEW	The court reviews whether the ALJ applied the correct legal standards and whether the ALJ's findings are supported by substantial evidence. The court may not conduct de novo review, resolve evidentiary conflicts, or decide credibility questions.
PRECEDENTIAL VALUE	unknown
PARTIES	Toni S. v. Commissioner of Social Security

TOPICS

- judicial review of agency action
- agency adjudication
- administrative law
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the ALJ's residual functional capacity determination was supported by substantial evidence and adequately explained.
2. Whether the ALJ adequately addressed Plaintiff's testimony that she needed to lie down during the workday.
3. Whether the ALJ applied the correct legal standards in evaluating Plaintiff's pain and symptoms.

HOLDINGS

1. The ALJ's RFC determination was not adequately explained because the ALJ did not identify medical or nonmedical evidence showing that Plaintiff could perform light work with a sit/stand option every hour for five minutes.
2. The ALJ erred by failing to address Plaintiff's complaints that she needed to lie down during the day.

KEY QUOTATIONS

"Ultimately, it the responsibility of the ALJ to build an "accurate and logical bridge" from the evidence to her conclusions." (PageID.57)

"Here, however, the ALJ did not fully explain why she limited Plaintiff to a sit/stand option every hour for five minutes." (PageID.57)

"Accordingly, the ALJ's decision is reversed and this matter is remanded to the Commissioner for further consideration." (Conclusion)

FACTUAL BACKGROUND

Plaintiff alleged disability based on multiple physical and mental impairments, including degenerative disc disease, foot deformities, an umbilical hernia, anxiety, personality disorder, and polysubstance use disorder. The medical record included examinations showing generally normal gait, strength, range of motion, and straight-leg testing, but also documented pain, foot abnormalities, an abdominal hernia, and later decreased sensation and motor strength in the right leg. Plaintiff testified that she could stand for about ten minutes, sit for no more than five minutes before stretching, could lift only five pounds, and needed to lie down during the day. The ALJ limited Plaintiff to light work with a sit/stand option but did not adequately explain the evidentiary basis for that limitation or address the alleged need to lie down.

PROCEDURAL HISTORY

Plaintiff applied for SSI on May 31, 2022, alleging disability beginning January 1, 2007. The claim was denied initially and on reconsideration. After an ALJ hearing on July 9, 2024, the ALJ denied benefits on August 27, 2024, finding that Plaintiff could perform light work with restrictions and that jobs existed in significant numbers in the national economy. Plaintiff filed this action, and the district court reversed and remanded.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The matter is remanded to the Commissioner for further consideration of the RFC determination, including the evidentiary basis for the sit/stand limitation and Plaintiff's allegation that she needed to lie down during the workday.

CASES CITED

- Winslow v. Comm'r of Soc. Sec., 566 F. App'x 418, 420 (6th Cir. 2014)
- Blakley v. Comm'r of Soc. Sec., 581 F.3d 399, 405 (6th Cir. 2009)
- Garner v. Heckler, 745 F.2d 383, 387 (6th Cir. 1984)
- Jones v. Sec'y of Health & Human Servs., 945 F.2d 1365, 1369 (6th Cir. 1991)
- Richardson v. Sec'y of Health & Human Servs., 735 F.2d 962, 963 (6th Cir. 1984)
- Mullen v. Bowen, 800 F.2d 535, 545 (6th Cir. 1986)
- Bogle v. Sullivan, 998 F.2d 342, 347 (6th Cir. 1993)
- Deaton v. Comm'r of Soc. Sec., 315 F. App'x 595, 598 (6th Cir. 2009)
- Torres v. Comm'r of Soc. Sec., 490 F. App'x 748, 754 (6th Cir. 2012)
- Rudd v. Comm'r of Soc. Sec., 531 F. App'x 719, 728 (6th Cir. 2013)
- Lamere v. Comm' of Soc. Sec., No. 2:17-CV-93, 2018 WL 4501201, at *4 (W.D. Mich. Sept. 20, 2018)
- Skinner v. Comm'r of Soc. Sec., No. 2:23-CV-155, 2024 WL 3970267, at *1 (W.D. Mich. Aug. 28, 2024)

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