

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
ILLINOIS

Crystal B. v. Commissioner of Social Security

No. 25-cv-28-RJD · No. 25-cv-28-RJD · Decided March 26, 2026

SUMMARY

The United States District Court for the Southern District of Illinois reviews a denial of the plaintiff’s application for Social Security Disability Insurance benefits under 42 U.S.C. § 405(g). The court addresses challenges to the ALJ’s assessment of the plaintiff’s mental and physical residual functional capacity, including alleged limitations involving concentration, mental impairments, and left-arm overhead lifting.

CASE DETAILS

COURT	United States District Court for the Southern District of Illinois
WRITING FOR THE COURT	Reona J. Daly
JURISDICTION	United States District Court for the Southern District of Illinois
DECIDED	March 26, 2026
DOCKET	25-cv-28-RJD
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying her application for Disability Insurance Benefits.
STANDARD OF REVIEW	The court reviewed whether the ALJ's findings were supported by substantial evidence and whether the ALJ applied the correct legal standards. It could not reweigh evidence, resolve evidentiary conflicts, decide credibility questions anew, or substitute its judgment for the ALJ's. The ALJ's evaluation of subjective symptoms would be disturbed only if patently wrong, meaning lacking any explanation or support.
PRECEDENTIAL VALUE	unpublished district court memorandum and order; nonprecedential
PARTIES	Crystal B. v. Commissioner of Social Security

TOPICS

judicial review of agency action

agency adjudication

administrative law

disability definition

ada / disability

PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ erred by failing to include mild mental-function limitations identified at Step 2 in the RFC or vocational hypothetical.
2. Whether the ALJ improperly evaluated Plaintiff's subjective complaints and medical evidence concerning her inability to lift her left arm overhead and other physical limitations.
3. Whether the vocational expert's testimony concerning the production-worker position was erroneous and, if so, whether any error was harmless because the ALJ also found Plaintiff capable of performing her past work as a surgical technician.

HOLDINGS

1. The ALJ did not err by omitting mental limitations from the RFC because the mild limitations identified at Step 2 were not supported by the medical record or medical opinions, and the ALJ adequately explained his evaluation of Plaintiff's mental complaints.
2. The ALJ did not err in assessing Plaintiff's subjective complaints or physical RFC because the decision reasonably relied on generally normal or improved objective findings and medical opinions that accounted for Plaintiff's shoulder and left-side complaints but did not identify additional restrictions.
3. Any asserted error concerning the production-worker testimony was harmless because the ALJ independently found that Plaintiff could perform her past relevant work as a surgical technician.

KEY QUOTATIONS

"Thus, this Court must determine not whether Plaintiff was, in fact, disabled at the relevant time but whether the ALJ's findings were supported by substantial evidence and whether any errors of law were made." (Page 2)

"In sum, while the ALJ did not devote a separate section in Step 4 discussing the reasons for not incorporating Plaintiff's mild mental limitations into the RFC, he adequately explained those reasons throughout his discussion of Plaintiff's medical records, reports of subjective symptoms, and medical opinions by engaging in a combined analysis of Plaintiff's physical and mental impairments." (Page 14)

"Accordingly, any error in the VE's testimony is harmless." (Page 21)

FACTUAL BACKGROUND

Crystal B. applied for Disability Insurance Benefits, alleging physical and mental limitations following an adverse reaction to a Moderna COVID-19 vaccination, including neuropathy, weakness, left shoulder

limitations, anxiety, and depression. The ALJ found severe physical impairments but found anxiety and depression nonsevere, with only mild limitations in the four Paragraph B domains, and assessed an RFC for light work with postural and environmental restrictions. The ALJ found that Plaintiff could perform her past relevant work as a production worker or surgical technician. The district court concluded that the RFC and symptom evaluation were adequately supported by normal or improved examinations and medical opinions that did not identify additional mental, lifting, or manipulative restrictions.

PROCEDURAL HISTORY

Plaintiff applied for Disability Insurance Benefits on March 29, 2022, alleging disability beginning August 31, 2021. After a hearing on August 29, 2023, the ALJ denied benefits on September 15, 2023. The Appeals Council denied review on November 7, 2024, making the ALJ's decision final and appealable. The district court affirmed the Commissioner's decision and dismissed the action with prejudice.

DISPOSITION

affirmed

CASES CITED

- Zurawski v. Halter, 245 F.3d 881, 886 (7th Cir. 2001)
- Lopez ex rel. Lopez v. Barnhart, 336 F.3d 535, 539 (7th Cir. 2003)
- Biestek v. Berryhill, 587 U.S. 97, 139 S. Ct. 1148, 1154, 203 L. Ed. 2d 504 (2019)
- Burmester v. Berryhill, 920 F.3d 507, 510 (7th Cir. 2019)
- Parker v. Astrue, 597 F.3d 920, 921 (7th Cir. 2010), as amended on reh'g in part (May 12, 2010)
- Ehrhart v. Secretary of Health & Human Services, 969 F.2d 534, 538 (7th Cir. 1992)
- Murphy v. Colvin, 759 F.3d 811, 817 (7th Cir. 2014)
- Varga v. Colvin, 794 F.3d 809, 813 (7th Cir. 2015)
- Yurt v. Colvin, 758 F.3d 850, 857 (7th Cir. 2014)
- DeCamp v. Berryhill, 916 F.3d 671, 675-676 (7th Cir. 2019)
- Steele v. Barnhart, 290 F.3d 936, 940 (7th Cir. 2002)
- Weber v. Kijakazi, No. 20-2990, 2021 WL 3671235, at *5 (7th Cir. Aug. 19, 2021)
- Clifford v. Apfel, 227 F.3d 863, 872 (7th Cir. 2000), as amended (Dec. 13, 2000)
- Pepper v. Colvin, 712 F.3d 351, 367 (7th Cir. 2013)
- Outlaw v. Astrue, 412 F. App'x 894, 898 (7th Cir. 2011)
- Terri E. G. v. Commissioner of Social Security, No. 3:21-CV-447-DWD, 2022 WL 1570501, at *6 (S.D. Ill. May 18, 2022)
- Streikus v. O'Malley, No. 22-2484, 2024 WL 983568, at *5 (7th Cir. Mar. 7, 2024)
- Charles MC v. Saul, No. 18 C 6949, 2020 WL 231080, at *3 (N.D. Ill. Jan. 15, 2020)
- Alesia v. Astrue, 789 F. Supp. 2d 921 (N.D. Ill. 2011)
- Felts v. Saul, 797 F. App'x 266, 269-271 (7th Cir. 2019)

- Moore v. Colvin, 743 F.3d 1118, 1121 (7th Cir. 2014)
- Golembiewski v. Barnhart, 322 F.3d 912, 918 (7th Cir. 2003)
- Castile v. Astrue, 617 F.3d 923, 927 (7th Cir. 2010)
- Skarbek v. Barnhart, 390 F.3d 500, 504 (7th Cir. 2004)
- Hoyt v. Colvin, 553 F. App'x 625, 628 (7th Cir. 2014)
- Crowell v. Kijakazi, 72 F.4th 810, 817 (7th Cir. 2023)
- Pavlicek v. Saul, 994 F.3d 777, 781, 783 (7th Cir. 2021)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/state/united-states-district-court-for-the-southern-district-of-illinois-united-states-district-court-for/2026/crystal-b-v-commissioner-of-social-security-n1ashceg>