

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
NEW YORK

Amanda Michelle R.-Z. v. Commissioner of Social Security

Ruiz-Zayas · No. 6:24-CV-01454 · Decided March 9, 2026

SUMMARY

The United States District Court for the Northern District of New York reviews the denial of Amanda Michelle R.-Z.'s application for Social Security disability insurance benefits. The court concludes that the Administrative Law Judge inadequately addressed a consultative psychologist's opinion and remands the Commissioner's decision for further proceedings, granting the plaintiff's motion and denying the Commissioner's motion.

CASE DETAILS

COURT	United States District Court for the Northern District of New York
WRITING FOR THE COURT	Paul J. Evangelista
JURISDICTION	United States District Court for the Northern District of New York
DECIDED	March 9, 2026
DOCKET	6:24-CV-01454
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Judicial review under 42 U.S.C. § 405(g) of the Commissioner's denial of disability insurance benefits; the parties' cross-motions were treated under General Order 18 as motions for judgment on the pleadings under Federal Rule of Civil Procedure 12(c).
STANDARD OF REVIEW	The court reviewed whether the Commissioner applied the correct legal standards and whether the decision was supported by substantial evidence. It could not determine de novo whether plaintiff was disabled.
PRECEDENTIAL VALUE	Nonprecedential district-court memorandum-decision and order
PARTIES	Amanda Michelle R.-Z. v. Commissioner of Social Security

TOPICS

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

PRACTICE AREAS

Social Security

administrative law

civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ erred by failing to evaluate and address the supportability and consistency of Dr. Grassl's pre-onset medical opinion.
2. Whether the ALJ's residual functional capacity determination was supported by substantial evidence despite plaintiff's arguments concerning hypersomnia, sleep apnea, and irritable bowel syndrome.

HOLDINGS

1. The ALJ was required to consider and address Dr. Grassl's opinion because it concerned the same or similar mental-health conditions, symptoms, and limitations evaluated during the relevant disability period. The fact that the opinion predated the alleged onset date, standing alone, did not make it irrelevant.
2. The error was not harmless because the omitted limitations could affect the RFC determination and judicial review was frustrated.

KEY QUOTATIONS

“ALJs are permitted to and “regularly review” evidence created prior to the filing date, as it is “often relevant” to the claims period.” (at 12-13)

““[E]vidence from before or after the relevant time period often provides necessary context for a disability claim and, if so, an ALJ cannot simply ignore it.”” (at 13)

“As the ALJ did not determine whether these additional limitations affect plaintiff's RFC, judicial review is frustrated, and remand is necessary for the ALJ to render a determination in the first instance.” (at 16)

FACTUAL BACKGROUND

Plaintiff applied for disability insurance benefits alleging disability beginning July 21, 2022, based on physical and mental impairments including bipolar disorder, anxiety disorder, PTSD, sleep apnea, hypersomnia, and irritable bowel syndrome. The ALJ found several severe impairments but determined that plaintiff retained the residual functional capacity for a restricted range of light work and could perform jobs existing in significant numbers in the national economy. A consultative psychologist, Dr. Grassl, had evaluated plaintiff in August 2020 and identified moderate limitations in concentration, consistent pace, regular attendance, and emotional regulation, but the ALJ discounted the opinion primarily because it predated the relevant period and did not address all of its limitations.

PROCEDURAL HISTORY

The Social Security Administration denied plaintiff's application for disability insurance benefits initially and on reconsideration. After a hearing, an administrative law judge issued an unfavorable decision, and the Appeals Council affirmed on October 15, 2024. Plaintiff then commenced this action, moved to vacate and remand, and

the Commissioner cross-moved for affirmance. The court granted plaintiff's motion, denied the Commissioner's motion, reversed the decision, and remanded for further proceedings.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remand for further proceedings requiring the ALJ to consider and address Dr. Grassl's opinion, including the limitations concerning regular attendance, emotional regulation, control of behavior, and maintenance of well-being, and to determine whether those limitations affect plaintiff's RFC. The ALJ may also address plaintiff's remaining arguments concerning hypersomnia, sleep apnea, and irritable bowel syndrome.

CASES CITED

- Joseph J. B. v. Comm'r of Soc. Sec., 2024 WL 4217371, at *1-2 (N.D.N.Y. Aug. 29, 2024)
- Wagner v. Sec'y of Health & Human Servs., 906 F.2d 856, 860 (2d Cir. 1990)
- Johnson v. Bowen, 817 F.2d 983, 985-86 (2d Cir. 1987)
- Berry v. Schweiker, 675 F.2d 464, 467 (2d Cir. 1982)
- Halloran v. Barnhart, 362 F.3d 28, 31 (2d Cir. 2004) (per curiam)
- Richardson v. Perales, 402 U.S. 389, 401 (1971)
- Brault v. Soc. Sec. Admin., Comm'r, 683 F.3d 443, 448 (2d Cir. 2012) (per curiam)
- Martone v. Apfel, 70 F. Supp. 2d 145, 148 (N.D.N.Y. 1999)
- Rosado v. Sullivan, 805 F. Supp. 147, 153 (S.D.N.Y. 1992)
- Barnhart v. Thomas, 540 U.S. 20, 24 (2003)
- DeChirico v. Callahan, 134 F.3d 1177, 1180 (2d Cir. 1998)
- Crane v. Comm'r of Soc. Sec. Admin., 2024 WL 4569417, at *14 (E.D.N.Y. Oct. 24, 2024)
- Hahn v. Saul, 2023 WL 4975970, at *4 (E.D.N.Y. Aug. 3, 2023)
- Berry v. Comm'r of Soc. Sec., 2024 WL 1382765, at *5 (E.D.N.Y. Mar. 21, 2024)
- Williams v. Kijakazi, 2022 WL 799478, at *12 (S.D.N.Y. Mar. 16, 2022)
- Tina S. v. Comm'r of Soc. Sec., 2023 WL 4286039, at *6 (W.D.N.Y. June 29, 2023)
- Cichocki v. Astrue, 729 F.3d 172, 178 n.3 (2d Cir. 2013)
- Zabala v. Astrue, 595 F.3d 402, 409-10 (2d Cir. 2010)
- Simpson v. Comm'r of Soc. Sec., 2025 WL 1156973, at *2 (2d Cir. Apr. 21, 2025) (summary order)
- Steve P. v. Comm'r of Soc. Sec., 2021 WL 307566, at *5 (W.D.N.Y. Jan. 29, 2021)
- Robinson v. Berryhill, 2018 WL 4442267, at *4 (W.D.N.Y. Sept. 17, 2018)
- Michael R. D. v. Comm'r of Soc. Sec., 2023 WL 3869022, at *4 (W.D.N.Y. June 7, 2023)
- Camille v. Colvin, 104 F. Supp. 3d 329, 343 (W.D.N.Y. 2015), aff'd, 652 F. App'x 25 (2d Cir. 2016) (summary order)

- Angele J. W. v. Comm'r of Soc. Sec., 2024 WL 4204301, at *5 (N.D.N.Y. July 24, 2024)
- Benitez v. Comm'r of Soc. Sec., 2024 WL 1332612, at *8 (E.D.N.Y. Mar. 28, 2024)
- Andrea G. v. Comm'r of Soc. Sec., 2022 WL 204400, at *7 (N.D.N.Y. Jan. 24, 2022)
- Hernandez v. Colvin, 2017 WL 2224197, at *9 (W.D.N.Y. May 22, 2017)
- Mauro v. Berryhill, 270 F. Supp. 3d 754, 762 (S.D.N.Y. 2017)
- Cheri Lee H. v. Comm'r of Soc. Sec., 2020 WL 109007, at *5 (N.D.N.Y. Jan. 9, 2020)
- Norman v. Astrue, 912 F. Supp. 2d 33, 82 (S.D.N.Y. 2012)
- Robert V. v. Kijakazi, 2022 WL 4536838, at *3 (D. Conn. Sept. 28, 2022)
- Bartrum v. Astrue, 32 F. Supp. 3d 320, 331 (N.D.N.Y. 2012)
- Rodgers v. Saul, 2020 WL 13551952, at *4 (D. Conn. May 28, 2020)
- Williams v. Astrue, 2012 WL 3096694, at *1 (E.D.N.Y. July 30, 2012)
- Lockwood v. Comm'r of Soc. Sec. Admin., 914 F.3d 87, 94 (2d Cir. 2019)

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