

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

Margaret F. v. Commissioner of Social Security

Civil Action No. 2:25-cv-651 (S.D. Ohio Mar. 12, 2026) · No. 2:25-cv-651 · Decided March 12, 2026

SUMMARY

The United States District Court for the Southern District of Ohio reviewed the Commissioner of Social Security’s denial of Margaret F.’s application for disability insurance benefits. The court upheld the ALJ’s evaluation of the medical opinions but found that the ALJ inaccurately characterized evidence concerning Plaintiff’s memory loss and failed to adequately account for that issue in the residual functional capacity assessment. The Commissioner’s decision was reversed and the case was remanded under Sentence Four of 42 U.S.C. § 405(g).

CASE DETAILS

COURT	United States District Court for the Southern District of Ohio, Eastern Division
WRITING FOR THE COURT	Chelsey M. Vascura
JURISDICTION	United States District Court for the Southern District of Ohio, Eastern Division
DECIDED	March 12, 2026
DOCKET	2:25-cv-651
DISPOSITION	reversed_and_remanded
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. The court reviewed the administrative record and the parties' briefing and remanded under Sentence Four of § 405(g).
STANDARD OF REVIEW	The court must affirm the Commissioner's decision if it is supported by substantial evidence and made under proper legal standards. Substantial evidence means relevant evidence that a reasonable mind might accept as adequate, and the court must consider the record as a whole, including evidence detracting from the decision. A decision will not be upheld where the Social Security Administration fails to follow its regulations and the error prejudices the claimant on the merits or deprives the claimant of a substantial right.

PRECEDENTIAL VALUE	Unpublished federal district court opinion; precedential status not stated
PARTIES	Margaret F. 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 properly evaluated the supportability and consistency of medical opinions from Dr. Ligas and Dr. Romero.
2. Whether the ALJ reversibly erred by failing to account for Plaintiff's reported memory loss in the residual functional capacity assessment.
3. Whether the ALJ's repeated mischaracterization of the consultative examination's memory-testing results deprived the RFC determination of substantial-evidence support.

HOLDINGS

1. The ALJ properly considered the regulatory supportability and consistency factors and provided record-based reasons for finding Dr. Ligas's opinion only partially persuasive.
2. The ALJ did not reversibly err by finding Dr. Romero's opinion only partially persuasive or by failing to expressly compare Dr. Romero's opinion with Dr. Ligas's opinion.
3. The ALJ's RFC determination was not supported by substantial evidence because the ALJ repeatedly mischaracterized the only short-term memory test in the record by describing Plaintiff's recall as intact or unremarkable when she recalled zero of three items after a five-minute delay.
4. The ALJ's failure to classify memory loss as a separate severe impairment was not, by itself, dispositive because the ALJ found other severe impairments; the material question was whether the ALJ considered the limiting effects of memory loss in determining the RFC.

KEY QUOTATIONS

“But here, where the ALJ repeatedly mischaracterized the results of the only short-term memory test in the record, the Court cannot conclude that the ALJ’s determination was supported by substantial evidence.”
(Section IV.B)

“The pertinent inquiry is whether the ALJ considered the “limiting effects of all [the claimant’s] impairment(s), even those that are not severe, in determining [the claimant’s] residual functional capacity.””
(Section IV.B)

“Although the substantial evidence standard is deferential, it is not trivial.” (Section III)

FACTUAL BACKGROUND

Plaintiff alleged disability beginning November 26, 2021, after suffering a hemorrhagic stroke, and sought disability insurance benefits. The ALJ found severe impairments including stroke residuals, atrial fibrillation, degenerative spinal disease, and obesity, but determined that Plaintiff retained the capacity for light work with certain postural and hazard restrictions. Plaintiff reported memory problems after the stroke, but the ALJ repeatedly characterized the consultative examination as showing intact or unremarkable recall, even though the examination recorded recall of zero out of three items after a five-minute delay.

PROCEDURAL HISTORY

Plaintiff filed a disability insurance benefits application in September 2022. The application was denied initially and on reconsideration; following a telephonic hearing on April 9, 2024, the ALJ issued an unfavorable decision on April 25, 2024. The Appeals Council denied review on April 17, 2025, making the ALJ's decision final. The district court reversed the Commissioner's non-disability determination and remanded for further consideration.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remanded to the Commissioner and the ALJ under Sentence Four of 42 U.S.C. § 405(g) for further consideration consistent with the Opinion and Order, including reconsideration of the effect of Plaintiff's memory loss on her residual functional capacity.

CASES CITED

- Colvin v. Barnhart, 475 F.3d 727, 730 (6th Cir. 2007)
- Henley v. Astrue, 573 F.3d 263, 264 (6th Cir. 2009)
- Foster v. Halter, 279 F.3d 348, 354 (6th Cir. 2001)
- DeLong v. Commissioner of Social Security, 748 F.3d 723, 726 (6th Cir. 2014)
- Moats v. Commissioner of Social Security, 42 F.4th 558, 561 (6th Cir. 2022)
- Biestek v. Berryhill, 139 S. Ct. 1148, 1154 (2019)
- Golden Living Center-Frankfort v. Secretary of Health and Human Services, 656 F.3d 421, 425 (6th Cir. 2011)
- Universal Camera Corp. v. NLRB, 340 U.S. 474, 487 (1951)
- Emard v. Commissioner of Social Security, 953 F.3d 844, 849 (6th Cir. 2020)
- Crum v. Sullivan, 921 F.2d 642, 644 (6th Cir. 1990)
- Rabbers v. Commissioner of Social Security, 582 F.3d 647, 651 (6th Cir. 2009)
- Bowen v. Commissioner of Social Security, 478 F.3d 742, 746 (6th Cir. 2007)

- DeLong v. Commissioner of Social Security Administration, 748 F.3d 723, 726 (6th Cir. 2014)
- White v. Commissioner of Social Security, 572 F.3d 272, 284 (6th Cir. 2009)
- Swartz v. Commissioner of Social Security, No. 1:10-CV-00605, 2011 WL 4571877, at *7 (S.D. Ohio Aug. 18, 2011)
- Simpson v. Commissioner of Social Security, No. 1:20-CV-2767, 2021 WL 8342840, at *8 (N.D. Ohio Nov. 30, 2021)
- Chaney v. Commissioner of Social Security Administration, No. 1:22-cv-1291, 2023 WL 5509429, at *11 n.2 (N.D. Ohio Aug. 25, 2023)
- Stanley v. Commissioner of Social Security Administration, No. 1:18-cv-1733, 2019 WL 4480183, at *9 (N.D. Ohio Sept. 18, 2019)
- Elizabeth A. v. Commissioner of Social Security, No. 2:22-CV-02313, 2023 WL 5924414, at *7 (S.D. Ohio Sept. 12, 2023)
- Jones v. Commissioner of Social Security, 336 F.3d 469, 474 (6th Cir. 2003)
- Harley v. Commissioner of Social Security, 485 F. App'x 802, 803 (6th Cir. 2012)
- Higgs v. Bowen, 880 F.2d 860, 862-63 (6th Cir. 1988)
- Farris v. Secretary of Health & Human Services, 773 F.2d 85, 90 n.1 (6th Cir. 1985)
- Emard v. Commissioner of Social Security, 953 F.3d 844, 852 (6th Cir. 2020)
- Pompa v. Commissioner of Social Security, 73 F. App'x 801, 803 (6th Cir. 2003)
- Maziarz v. Secretary of Health & Human Services, 837 F.2d 240, 244 (6th Cir. 1987)

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