

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Kristin Watson v. Commissioner of Social Security

Watson · No. 1:21-cv-01717-ADA-HBK · Decided March 7, 2023

SUMMARY

The United States District Court for the Eastern District of California adopted the magistrate judge’s findings and recommendations in a Social Security appeal. The court denied Kristin Watson’s motion for summary judgment, granted the Commissioner’s cross-motion, affirmed the Commissioner’s decision, and directed the Clerk to close the case.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	March 7, 2023
DOCKET	1:21-cv-01717-ADA-HBK
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review of a final decision of the Commissioner of Social Security. After a magistrate judge recommended denying Plaintiff's motion for summary judgment, granting Defendant's cross-motion for summary judgment, and affirming the Commissioner's decision, the district court conducted de novo review of Plaintiff's timely objections and adopted the findings and recommendations.
STANDARD OF REVIEW	De novo review of the magistrate judge's findings and recommendations under 28 U.S.C. § 636(b)(1)(C); review of the Commissioner's decision for proper evaluation of the administrative record.
PRECEDENTIAL VALUE	Unknown; district court order with no reporter citation

TOPICS

- judicial review of agency action
- summary judgment
- administrative law
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the ALJ properly evaluated Plaintiff's subjective complaints and testimony concerning the severity of her symptoms.
2. Whether the Commissioner's decision should be affirmed after de novo review of the magistrate judge's findings and recommendations.

HOLDINGS

1. Plaintiff did not have to corroborate her alleged pain with objective medical findings, but she was required to demonstrate that the impairment was medically ascertained.
2. The ALJ properly evaluated Plaintiff's subjective complaints and did not improperly discredit her testimony.
3. The findings and recommendations were supported by the record and proper analysis and were adopted in full; Plaintiff's motion for summary judgment was denied, Defendant's motion was granted, and the Commissioner's decision was affirmed.

KEY QUOTATIONS

"In Bunnell, the court held that pain need not be corroborated by objective medical findings, but some impairment must be medically ascertained." (at 2)

"The Court finds that Plaintiff did not have to corroborate her alleged pain with objective medical findings, but Plaintiff must also demonstrate that the impairment is medically ascertained." (at 2)

FACTUAL BACKGROUND

Watson alleged disabling symptoms, including pain and functional limitations, in connection with her claim for Social Security benefits. The administrative law judge considered Watson's testimony, objective medical records, and findings from numerous medical professionals. The district court concluded that the ALJ considered evidence favorable to Watson and did not improperly discredit her testimony.

PROCEDURAL HISTORY

Kristin Watson initiated an action seeking review of the Commissioner's final decision. The matter was referred to a magistrate judge, who issued findings and recommendations on January 9, 2023. Plaintiff objected, largely reiterating her prior arguments concerning the evaluation of her subjective complaints. The district court reviewed the record de novo, adopted the findings and recommendations in full, denied Plaintiff's motion for summary judgment, granted Defendant's motion, affirmed the Commissioner's decision, and closed the case.

DISPOSITION

affirmed

CASES CITED

- Bunnell v. Sullivan, 947 F.2d 341, 347-48 (9th Cir. 1991)

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