

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

Richard Alan Palmer v. Commissioner of Social Security

Palmer · No. 1:25-cv-1963 · Decided April 8, 2026

SUMMARY

The United States District Court for the Northern District of Ohio reviews the Commissioner of Social Security’s denial of Richard Palmer’s application for supplemental security income. The court rejects Palmer’s arguments concerning the borderline-age rule and the Administrative Law Judge’s residual functional capacity finding, concluding that the decision is supported by substantial evidence. The court affirms the Commissioner’s decision.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio, Eastern Division
WRITING FOR THE COURT	James E. Grimes Jr.
JURISDICTION	United States District Court for the Northern District of Ohio, Eastern Division
DECIDED	April 8, 2026
DOCKET	1:25-cv-1963
DISPOSITION	affirmed
PROCEDURAL POSTURE	Judicial review of the Commissioner's final decision denying supplemental security income under 42 U.S.C. §§ 405(g) and 1383(c).
STANDARD OF REVIEW	The court must affirm unless the Commissioner applied incorrect legal standards or the ALJ's factual findings lack substantial evidence. Substantial evidence is more than a mere scintilla but is such relevant evidence as a reasonable mind might accept as adequate to support a conclusion. The court may not try the case de novo, resolve evidentiary conflicts, or decide credibility.
PRECEDENTIAL VALUE	Unpublished, nonprecedential district-court memorandum opinion
PARTIES	Richard Alan Palmer v. Commissioner of Social Security

TOPICS

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QUESTIONS PRESENTED

1. Whether the ALJ properly evaluated Palmer's borderline-age situation and permissibly declined to apply the higher age category.
2. Whether substantial evidence supported the ALJ's residual functional capacity finding that Palmer could perform light work, including standing and walking for approximately six hours in an eight-hour workday.
3. Whether 20 C.F.R. § 416.920c(b)(3) required the ALJ to articulate additional persuasiveness factors when evaluating the treating physician's opinion against the state-agency opinions.
4. Whether the ALJ adequately explained the evaluation of Palmer's alleged symptoms and limitations.

HOLDINGS

1. The ALJ did not err in declining to apply the higher age category because the ALJ recognized the borderline-age situation, evaluated the overall vocational factors, and explained that the record did not support a nonmechanical application of the grid rules.
2. The ALJ's finding that Palmer could perform light work with additional climbing and environmental restrictions was supported by substantial evidence.
3. The ALJ was not required to articulate the additional factors in 20 C.F.R. § 416.920c(c)(3)-(5) because the ALJ did not find the treating physician's opinion and the state-agency opinions equally well-supported and consistent with the record.
4. The ALJ adequately explained why Palmer's alleged limitations were not fully consistent with the evidence.

KEY QUOTATIONS

"Although a borderline age situation exists because the claimant is within a few days to a few months of attaining the next higher age category and use of the higher age category would result in a finding of "disabled" instead of "not disabled," use of this age category is not supported by the limited adverse impact of all factors on the claimant's ability to adjust to other work." (Tr. 27)

"I find these opinions persuasive because they are supported by, and consistent with, the more complete medical record." (Tr. 25)

FACTUAL BACKGROUND

Palmer alleged disability from spinal and joint problems, pain, obesity, numbness, and related conditions. Medical examinations generally showed intact or near-intact strength, normal or generally unremarkable gait and musculoskeletal findings, although Palmer sometimes used a walker and had episodes involving pain, cellulitis,

and deep vein thrombosis. State-agency reviewers assessed him as capable of light work with specified climbing and hazard limitations, while his treating physician imposed substantially greater restrictions. The ALJ adopted the light-work residual functional capacity and found that Palmer could perform jobs existing in significant numbers in the national economy.

PROCEDURAL HISTORY

Palmer applied for supplemental security income in July 2023. The Social Security Administration denied the application initially and on reconsideration; after an administrative hearing, an ALJ found Palmer not disabled. The Appeals Council denied further review on July 18, 2025, making the ALJ's decision final. Palmer filed this action on September 16, 2025, and the parties consented to the magistrate judge's jurisdiction. The court affirmed the Commissioner's decision.

DISPOSITION

affirmed

CASES CITED

- *McClanahan v. Commissioner of Social Security*, 193 F. App'x 422, 425 (6th Cir. 2006)
- *Howard v. Commissioner of Social Security*, 276 F.3d 235, 239 (6th Cir. 2002)
- *Webb v. Commissioner of Social Security*, 368 F.3d 629, 631 (6th Cir. 2004)
- *Colvin v. Barnhart*, 475 F.3d 727, 730 (6th Cir. 2007)
- *Jordan v. Commissioner of Social Security*, 548 F.3d 417, 422-23 (6th Cir. 2008)
- *Walters v. Commissioner of Social Security*, 127 F.3d 525, 529 (6th Cir. 1997)
- *Biestek v. Berryhill*, 587 U.S. 97, 99, 102-03 (2019)
- *Bass v. McMahon*, 499 F.3d 506, 509 (6th Cir. 2007)
- *Jones v. Commissioner of Social Security*, 336 F.3d 469, 477 (6th Cir. 2003)
- *Lindsley v. Commissioner of Social Security*, 560 F.3d 601, 605 (6th Cir. 2009)
- *Felisky v. Bowen*, 35 F.3d 1027, 1035 (6th Cir. 1994)
- *Bowie v. Commissioner of Social Security*, 539 F.3d 395, 399-401 (6th Cir. 2008), as amended (Nov. 11, 2008)
- *Pruitt v. Commissioner of Social Security*, No. 1:16-cv-2927, 2018 WL 1468584, at *8 (N.D. Ohio Mar. 26, 2018)
- *Davis v. Secretary of Health & Human Services*, 867 F.2d 336, 340 (6th Cir. 1989)
- *Kurman v. Kijakazi*, No. 1:20-cv-1837, 2022 WL 1067568, at *7 (N.D. Ohio Jan. 13, 2022), report and recommendation adopted, 2022 WL 765072 (N.D. Ohio Mar. 14, 2022)
- *Giering v. Commissioner of Social Security*, No. 20-12353, 2022 U.S. Dist. LEXIS 124246, at *4 (E.D. Mich. July 13, 2022)