

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
OHIO

James D. Dieter v. Commissioner of Social Security

Dieter · No. 3:25-cv-00265 · Decided March 13, 2026

SUMMARY

The United States District Court for the Northern District of Ohio overruled James D. Dieter’s objection to a magistrate judge’s Report and Recommendation and adopted the recommendation affirming the Commissioner of Social Security’s denial of benefits. The court held that the administrative law judge adequately defined and applied the limitation to “superficial” workplace interactions and was not required to adopt a definition from an unrelated Appeals Council decision.

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio
WRITING FOR THE COURT	James R. Knepp II
JURISDICTION	United States District Court for the Northern District of Ohio
DECIDED	March 13, 2026
DOCKET	3:25-cv-00265
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's denial of supplemental security income and objected to a magistrate judge's report and recommendation.
STANDARD OF REVIEW	The court conducted de novo review of the portions of the magistrate judge's R&R to which Plaintiff objected under 28 U.S.C. § 636(b)(1) and Federal Rule of Civil Procedure 72(b)(2)-(3). For the underlying Social Security decision, the court affirmed unless the Commissioner failed to apply the correct legal standards or made findings unsupported by substantial evidence.
PRECEDENTIAL VALUE	unpublished, nonprecedential district-court memorandum opinion
PARTIES	James D. Dieter v. Commissioner of Social Security

TOPICS

- judicial review of agency action
- agency adjudication
- administrative law
- civil procedure

PRACTICE AREAS

Social Security

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ was required to address and apply a definition of superficial workplace interaction stated in an Appeals Council order issued in an unrelated Social Security case.
2. Whether the ALJ's definition of superficial interactions and resulting RFC were supported by substantial evidence and complied with applicable legal standards.

HOLDINGS

1. The ALJ was not required to address the substance of a definition of superficial interaction contained in a nonbinding Appeals Council order from an unrelated case.
2. The Commissioner's decision was affirmed because Plaintiff failed to establish reversible error in the ALJ's treatment of the superficial-interaction limitation.

KEY QUOTATIONS

“Moreover, as “superficial interactions” is not a defined vocational term, the undersigned has provided clarification of its meaning, applicable in this claim, as referenced within the adopted residual functional capacity herein.” (Tr. 17-18)

“The Court agrees with Judge Knapp that “the ALJ did not err when she declined to address the substance of that non-binding order in her decision.”” (Doc. 10 at 29-30)

“Substantial evidence is defined as such relevant evidence as a reasonable mind might accept as adequate to support a conclusion.” (Standard of Review)

FACTUAL BACKGROUND

Plaintiff applied for supplemental security income in June 2022, alleging disability beginning November 1, 2021. The state-agency psychologists opined that he should have infrequent interactions with the public and coworkers and that any interactions should be superficial. The ALJ adopted an RFC limiting Plaintiff to occasional, brief, and superficial interactions and defined superficial interactions in functional terms. Plaintiff argued that the ALJ instead should have applied a definition of superficial interaction stated by the Appeals Council in an unrelated claimant's case.

PROCEDURAL HISTORY

After the Commissioner denied Plaintiff's supplemental security income claim, the case was referred to Magistrate Judge Amanda M. Knapp, who recommended affirming the Commissioner's decision. Plaintiff objected to the R&R, primarily arguing that the ALJ improperly defined the RFC limitation concerning superficial workplace interactions. The district court considered the objection, adopted the R&R, and affirmed the Commissioner's decision.

DISPOSITION

affirmed

CASES CITED

- Walters v. Comm’r of Soc. Sec., 127 F.3d 525, 528 (6th Cir.)
- Colvin v. Barnhart, 475 F.3d 727, 730 (6th Cir.)
- McClanahan v. Comm’r of Soc. Sec., 474 F.3d 830, 833 (6th Cir.)
- Mabry-Schlichter v. Commissioner of Social Security, 2025 WL 1604376 (6th Cir.)
- Reeves v. Comm’r of Soc. Sec., 618 F. App’x 267, 275 (6th Cir.)
- Dawn M. v. Commissioner of Social Security, 2024 U.S. Dist. LEXIS 133382 (6th Cir. Jun. 6, 2025)

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