

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
CALIFORNIA

Lauren R. v. Frank Bisignano, Commissioner of Social Security

Lauren R. · No. 24-cv-2210-RSH-JLB · Decided August 15, 2025

SUMMARY

The United States District Court for the Southern District of California reviewed the denial of Lauren R.'s applications for Social Security disability insurance benefits and supplemental security income. The court vacated the Commissioner's decision and remanded for further administrative proceedings because the ALJ did not sufficiently explain the treatment of Plaintiff's subjective testimony and potentially also needed to reassess a nurse practitioner's medical opinion.

CASE DETAILS

COURT	United States District Court for the Southern District of California
WRITING FOR THE COURT	Robert S. Huie
JURISDICTION	United States District Court for the Southern District of California
DECIDED	August 15, 2025
DOCKET	24-cv-2210-RSH-JLB
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Action for judicial review of the Commissioner's denial of applications for disability insurance benefits and supplemental security income under Titles II and XVI of the Social Security Act.
STANDARD OF REVIEW	The Commissioner's decision is reviewed for substantial evidence and legal error. The court must consider the entire administrative record, may not affirm on grounds not relied on by the ALJ, and must uphold the ALJ's conclusion where the evidence is susceptible to more than one rational interpretation, subject to harmless-error principles.
PRECEDENTIAL VALUE	Unknown
PARTIES	Lauren R. v. Frank Bisignano, Commissioner of Social Security

TOPICS

- judicial review of agency action
- agency adjudication
- administrative law
- remedies

PRACTICE AREAS

Social Security disability

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ provided sufficiently specific, clear, and convincing reasons for discounting Plaintiff's subjective symptom testimony.
2. Whether the ALJ adequately explained the finding that nurse practitioner Shannon Baker's medical questionnaire was inconsistent with the medical and other evidence.
3. Whether the Commissioner's denial of benefits should be affirmed, modified, reversed, or remanded under 42 U.S.C. § 405(g).

HOLDINGS

1. The ALJ's decision did not identify with sufficient detail what portions of Plaintiff's testimony were credited and what portions were undermined by the evidence, and its explanation of the alleged inconsistency with the medical record was too unclear to permit effective judicial review.
2. The court did not decide whether the ALJ's evaluation of Baker's opinion independently required remand, but directed that the ALJ may re-address the opinion on remand.

KEY QUOTATIONS

"This analysis is not before the Court." (at 6)

"Under these circumstances, the Court determines that the ALJ's Decision fails to identify in sufficient detail 'what testimony is credible and what testimony undermines the claimant's complaints,' Greger, 464 F.3d at 972, and concludes that the rationale contained in the ALJ's Decision is not 'clear enough that it has the power to convince.' Smartt, 53 F.4th at 499." (at 7)

"For the foregoing reasons, the Court VACATES the ALJ's Decision of June 21, 2024, and REMANDS the action for further administrative proceedings pursuant to sentence four of 42 U.S.C. § 405(g)." (at 11)

FACTUAL BACKGROUND

Plaintiff alleged disability based primarily on spinal and cardiovascular impairments, including chronic ischemic heart disease, degenerative disc disease, and tachycardia. The ALJ found that she had the residual functional capacity for light work with postural limitations and could perform past relevant work or, alternatively, other work existing in significant numbers. The ALJ discounted portions of Plaintiff's subjective symptom testimony and found a nurse practitioner's restrictive functional assessment unpersuasive.

PROCEDURAL HISTORY

Plaintiff applied for disability benefits, was denied initially and on reconsideration, received an administrative hearing, and was found not disabled by an ALJ. The Appeals Council denied review, making the ALJ's decision the Commissioner's final decision. Plaintiff then filed this action under 42 U.S.C. §§ 405(g) and 1383(c)(3).

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The court vacated the ALJ's June 21, 2024 decision and remanded pursuant to sentence four of 42 U.S.C. § 405(g) for further administrative proceedings. On remand, the ALJ may re-address Shannon Baker's medical opinion.

CASES CITED

- Smith v. Berryhill, 139 S. Ct. 1765, 1772 (2019)
- Valentine v. Comm'r Soc. Sec. Admin., 574 F.3d 685, 689 (9th Cir. 2009)
- Bustamante v. Massanari, 262 F.3d 949, 953-54 (9th Cir. 2001)
- Woods v. Kijakazi, 32 F.4th 785, 788, 791-92 (9th Cir. 2022)
- Luther v. Berryhill, 891 F.3d 872, 875 (9th Cir. 2018)
- Biestek v. Berryhill, 587 U.S. 97, 102-03 (2019)
- Kitchen v. Kijakazi, 82 F.4th 732, 738-39 (9th Cir. 2023)
- Burch v. Barnhart, 400 F.3d 676, 679-80 (9th Cir. 2005)
- Garrison v. Colvin, 759 F.3d 995, 1009-10 (9th Cir. 2014)
- Ferguson v. O'Malley, 95 F.4th 1194, 1203 (9th Cir. 2024)
- Garcia v. Comm'r of Soc. Sec., 768 F.3d 925, 929 (9th Cir. 2014)
- Tommasetti v. Astrue, 533 F.3d 1035, 1038 (9th Cir. 2008)
- Smartt v. Kijakazi, 53 F.4th 489, 494, 498-99 (9th Cir. 2022)
- Carmickle v. Comm'r, Soc. Sec. Admin., 533 F.3d 1155, 1161 (9th Cir. 2008)
- Greger v. Barnhart, 464 F.3d 968, 972 (9th Cir. 2006)
- Treichler v. Comm'r of Soc. Sec. Admin., 775 F.3d 1090, 1099 (9th Cir. 2014)