

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Jamie C. v. Commissioner of Social Security

Jamie C. v. Commissioner of Social Security · No. Civil Action No. 25-46 (MAS) · Decided December 22, 2025

SUMMARY

The United States District Court for the District of New Jersey affirmed the Commissioner of Social Security’s denial of Jamie C.’s claim for Disability Insurance Benefits. The court held that any omission of conversion disorder at step two was harmless because the ALJ found other severe impairments and proceeded through the sequential evaluation. The court further concluded that the ALJ adequately considered the plaintiff’s impairments, medical evidence, residual functional capacity, and vocational evidence, and that the decision was supported by substantial evidence.

CASE DETAILS

|                       |                                                                                                                                                                                                                                 |
|-----------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the District of New Jersey                                                                                                                                                                     |
| WRITING FOR THE COURT | Michael A. Shipp                                                                                                                                                                                                                |
| JURISDICTION          | United States District Court for the District of New Jersey                                                                                                                                                                     |
| DECIDED               | December 22, 2025                                                                                                                                                                                                               |
| DOCKET                | Civil Action No. 25-46 (MAS)                                                                                                                                                                                                    |
| DISPOSITION           | affirmed                                                                                                                                                                                                                        |
| PROCEDURAL POSTURE    | Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner of Social Security's final decision denying Disability Insurance Benefits.                                                                        |
| STANDARD OF REVIEW    | The court reviewed the Commissioner's decision to determine whether it was supported by substantial evidence and adequately explained. The court could not reweigh the evidence or substitute its judgment for that of the ALJ. |
| PRECEDENTIAL VALUE    | unpublished, nonprecedential district court memorandum opinion                                                                                                                                                                  |
| PARTIES               | Jamie C. v. Commissioner of Social Security                                                                                                                                                                                     |

TOPICS

- judicial review of agency action
- administrative law
- disability definition

PRACTICE AREAS

## QUESTIONS PRESENTED

1. Whether the ALJ committed reversible error by failing to identify conversion disorder as a severe impairment at step two.
2. Whether the ALJ inadequately evaluated conversion disorder and Plaintiff's combined impairments at step three by not expressly citing Listing 12.07.
3. Whether the ALJ's findings concerning Dr. Greco's records, acute disseminated encephalomyelitis, medication effects, aggravating factors, and residual functional capacity were supported by substantial evidence.
4. Whether the ALJ erred by declining to obtain additional medical-expert testimony.

## HOLDINGS

1. Any omission of conversion disorder from the step-two findings was harmless because the ALJ found multiple other severe impairments and proceeded through the remaining steps of the sequential evaluation.
2. The ALJ's step-three analysis was legally sufficient and supported by substantial evidence even though it did not expressly cite Listing 12.07.
3. The ALJ's findings, including the residual functional capacity and determination that Plaintiff was not disabled, were supported by substantial evidence.
4. The ALJ did not err by declining to obtain additional medical-expert testimony.

## KEY QUOTATIONS

*“The step-two inquiry is a de minimis screening device to dispose of groundless claims.”* (at 8)

*“The Court, accordingly, affirms the ALJ’s decision.”* (at 16)

## FACTUAL BACKGROUND

Plaintiff alleged disability beginning June 16, 2011, with a date last insured of March 31, 2019, based on conditions including acute disseminated encephalomyelitis, migraine headaches, autonomic nervous-system disorders, mental impairments, and conversion disorder. The ALJ found several severe impairments, assessed a sedentary residual functional capacity with additional physical, environmental, and mental limitations, and found that Plaintiff could not perform past relevant work. Relying on vocational-expert testimony, the ALJ found that Plaintiff could perform jobs existing in significant numbers in the national economy.

## PROCEDURAL HISTORY

Plaintiff applied for Disability Insurance Benefits in July 2017. The application was denied initially and on reconsideration; an ALJ denied the claim in 2021, the Appeals Council granted review and remanded, and the ALJ again denied the claim on August 30, 2023. The Appeals Council denied further review, making the ALJ's decision final. The district court reviewed the decision on the parties' briefs and affirmed.

## DISPOSITION

affirmed

## CASES CITED

- *Matthews v. Apfel*, 239 F.3d 589, 592 (3d Cir. 2001)
- *Richardson v. Perales*, 402 U.S. 389, 390, 401 (1971)
- *Morales v. Apfel*, 225 F.3d 310, 316 (3d Cir. 2000)
- *Consolidated Edison Co. v. NLRB*, 305 U.S. 197, 229 (1938)
- *Ginsburg v. Richardson*, 436 F.2d 1146, 1148 (3d Cir. 1971)
- *Laws v. Celebrezze*, 368 F.2d 640, 642 (4th Cir. 1966)
- *Rutherford v. Barnhart*, 399 F.3d 546, 552-53 (3d Cir. 2005)
- *Fargnoli v. Massanari*, 247 F.3d 34, 38, 42 (3d Cir. 2001)
- *Hartranft v. Apfel*, 181 F.3d 358, 360 (3d Cir. 1999)
- *Zirnsak v. Colvin*, 777 F.3d 607, 610 (3d Cir. 2014)
- *Schaudeck v. Commissioner*, 181 F.3d 429, 431 (3d Cir. 1999)
- *Cotter v. Harris*, 642 F.2d 700, 706-07 (3d Cir. 1981)
- *Brown v. Yuckert*, 482 U.S. 137, 146 n.5 (1987)
- *Malloy v. Commissioner of Social Security*, 306 F. App'x 761, 763 (3d Cir. 2009)
- *Robert E. v. Commissioner of Social Security*, No. 20-6882, 2021 WL 5277193, at \*6 (D.N.J. Nov. 12, 2021)
- *Newell v. Commissioner of Social Security*, 347 F.3d 541, 546 (3d Cir. 2003)
- *Vanessa T-H. v. Commissioner of Social Security*, No. 23-2293, 2024 WL 1635685, at \*4 (D.N.J. Apr. 16, 2024)
- *Salles v. Commissioner of Social Security*, 229 F. App'x 140, 145 n.2 (3d Cir. 2007)
- *Rivera v. Commissioner of Social Security*, 164 F. App'x 260, 262 n.2 (3d Cir. 2006)
- *Heatly v. Commissioner of Social Security*, 382 F. App'x 823, 825 (11th Cir. 2010)
- *Jones v. Barnhart*, 364 F.3d 501, 505 (3d Cir. 2004)
- *Holloman v. Commissioner of Social Security*, 639 F. App'x 810, 813-14 (3d Cir. 2016)
- *Ward v. O'Malley*, No. 18-13675, 2024 WL 1048078, at \*6 (D.N.J. Mar. 11, 2024)
- *Morrison ex rel. Morrison v. Commissioner of Social Security*, 268 F. App'x 186, 189 (3d Cir. 2008)
- *Carin F. v. O'Malley*, No. 22-4193, 2024 WL 3949322, at \*14 (D.N.J. Aug. 27, 2024)
- *Hardee v. Commissioner of Social Security*, 188 F. App'x 127, 129 (3d Cir. 2006)
- *Miguel v. Commissioner of Social Security*, 129 F. App'x 678, 680 (3d Cir. 2005)
- *Porter v. Commissioner of Social Security*, No. 18-3744, 2019 WL 2590994, at \*4 (D.N.J. June 25, 2019)
- *Morris v. Commissioner of Social Security*, No. 19-13744, 2020 WL 2764803, at \*4 (D.N.J. May 28, 2020)
- *Izzo v. Commissioner of Social Security*, 186 F. App'x 280, 284 (3d Cir. 2006)
- *Conroy v. Leone*, 316 F. App'x 140, 144 n.5 (3d Cir. 2009)

- Bagot v. Ashcroft, 398 F.3d 252, 256 (3d Cir. 2005)

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