

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
MICHIGAN

Sarah C. v. Commissioner of Social Security

Sarah C. · No. 1:25-cv-00004 · Decided January 30, 2026

SUMMARY

The court reviewed Plaintiff Sarah C.’s appeal from the denial of Supplemental Security Income under 42 U.S.C. § 405(g). It held that the Administrative Law Judge properly evaluated Listing 11.14 for peripheral neuropathy and adequately assessed the residual functional capacity under SSR 96-8p. The court affirmed the Commissioner’s decision because it was supported by substantial evidence.

CASE DETAILS

COURT	United States District Court for the Western District of Michigan
WRITING FOR THE COURT	Maarten Vermaat
JURISDICTION	United States District Court for the Western District of Michigan
DECIDED	January 30, 2026
DOCKET	1:25-cv-00004
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of an Administrative Law Judge's denial of Supplemental Security Income benefits.
STANDARD OF REVIEW	The court reviewed whether the ALJ applied the correct legal standards and whether the decision was supported by substantial evidence. It did not conduct de novo review, resolve evidentiary conflicts, or decide credibility questions.
PRECEDENTIAL VALUE	unpublished district court opinion
PARTIES	Sarah C. v. Commissioner of Social Security

TOPICS

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

PRACTICE AREAS

- Social Security disability
- administrative law
- judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ properly evaluated Plaintiff's diabetic peripheral neuropathy under Listing 11.14.
2. Whether the ALJ complied with SSR 96-8p and supported the residual functional capacity assessment by considering all relevant impairments and symptoms.
3. Whether the ALJ was required to make additional findings concerning Plaintiff's alleged absenteeism for medical appointments.

HOLDINGS

1. The ALJ properly evaluated Listing 11.14A and substantial evidence supported the conclusion that Plaintiff did not have the extreme motor-function limitation required by the listing.
2. The ALJ's residual functional capacity assessment complied with the applicable requirements and was supported by substantial evidence.
3. Plaintiff's late-raised assertion that medical appointments would cause disabling absenteeism did not warrant relief because it was speculative, conclusory, and unsupported.

KEY QUOTATIONS

"The ALJ properly assessed § 11.14A and explained his reasoning." (PageID.1381-1382)

"Plaintiff's argument is essentially that the ALJ should have weighed and evaluated the evidence differently. But that is not ground for relief." (PageID.1410)

"Accordingly, the Court affirms the ALJ decision because the ALJ properly applied the regulations and because substantial evidence supports his decision." (PageID.1410)

FACTUAL BACKGROUND

Plaintiff alleged disability based on multiple impairments, including obesity, respiratory disease, cardiovascular disease, diabetes with peripheral neuropathy, sleep apnea, gastrointestinal conditions, and mental-health symptoms. The ALJ found several severe impairments but concluded that Plaintiff did not meet or medically equal a listed impairment, including Listing 11.14 for peripheral neuropathy. The ALJ assessed a restricted light-work residual functional capacity, including limits on standing, walking, postural activities, environmental exposure, hazards, overhead reaching, and position changes, and found that Plaintiff could perform other unskilled light occupations.

PROCEDURAL HISTORY

Plaintiff applied for SSI on February 25, 2022, alleging disability beginning that date. The SSA denied the claim initially and on reconsideration. After an August 31, 2023 hearing, the ALJ denied the claim on October 31, 2023. Plaintiff filed this action on January 2, 2025, and the district court affirmed the ALJ's decision.

DISPOSITION

affirmed

CASES CITED

- Winslow v. Commissioner of Social Security, 566 F. App'x 418, 420 (6th Cir. 2014)
- Blakley v. Commissioner of Social Security, 581 F.3d 399, 405 (6th Cir. 2009)
- Garner v. Heckler, 745 F.2d 383, 387 (6th Cir. 1984)
- Jones v. Secretary of Health & Human Services, 945 F.2d 1365, 1369 (6th Cir. 1991)
- Richardson v. Secretary of Health & Human Services, 735 F.2d 962, 963 (6th Cir. 1984)
- Mullen v. Bowen, 800 F.2d 535, 545 (6th Cir. 1986)
- Bogle v. Sullivan, 998 F.2d 342, 347 (6th Cir. 1993)
- Rabbers v. Commissioner of Social Security, 582 F.3d 647, 652 (6th Cir. 2009)
- Reynolds v. Commissioner of Social Security, 424 F. App'x 411, 416 (6th Cir. 2011)
- Deaton v. Commissioner of Social Security, 315 F. App'x 595, 598 (6th Cir. 2009)
- Torres v. Commissioner of Social Security, 490 F. App'x 748, 754 (6th Cir. 2012)
- Rudd v. Commissioner of Social Security, 531 F. App'x 719, 728 (6th Cir. 2013)
- Brown v. Commissioner of Social Security, No. 1:23-CV-122, 2024 WL 1259726, at *5 (W.D. Mich. Feb. 7, 2024)

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