

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Rosalba Beltran Quintero v. Frank Bisignano

No. 2:24-cv-10052-JC (C.D. Cal. Aug. 25, 2025) · No. 2:24-cv-10052-JC · Decided August 25, 2025

SUMMARY

The United States District Court for the Central District of California reviewed the denial of Plaintiff’s application for supplemental security income. The court held that the ALJ’s decision was supported by substantial evidence and that reliance on vocational-expert testimony addressing an additional, rejected walker limitation did not constitute material error; the Commissioner’s decision was affirmed.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Jacqueline Chooljian
JURISDICTION	United States District Court for the Central District of California
DECIDED	August 25, 2025
DOCKET	2:24-cv-10052-JC
DISPOSITION	affirmed
PROCEDURAL POSTURE	Review of the Commissioner's denial of an application for supplemental security income following denial by an Administrative Law Judge and denial of review by the Appeals Council.
STANDARD OF REVIEW	The court may set aside the Commissioner's final decision only if it is based on legal error or is not supported by substantial evidence. Review is highly deferential, and an error is harmless if it is inconsequential to the ultimate nondisability determination or the ALJ's path may reasonably be discerned despite the error.
PRECEDENTIAL VALUE	Unknown
PARTIES	Rosalba Beltran Quintero v. Frank Bisignano, Commissioner of Social Security

TOPICS

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

PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ erred by relying at step five on vocational-expert testimony responding to a hypothetical that included a front-wheeled-walker limitation that was not included in the final residual functional capacity assessment.
2. Whether any error in the hypothetical or residual functional capacity assessment warranted reversal or remand.

HOLDINGS

1. The ALJ properly relied on the vocational expert's testimony because the hypothetical included every limitation assessed in the RFC and added an extra, more restrictive limitation that the ALJ later rejected.
2. The Commissioner's decision was supported by substantial evidence and free from material error; Plaintiff failed to establish grounds for reversal or remand.

KEY QUOTATIONS

“Based on the record as a whole and the applicable law, the decision of the Commissioner is AFFIRMED.”
(1)

“A federal court may set aside a denial of benefits only when the Commissioner’s “final decision” was “based on legal error or not supported by substantial evidence in the record.”” (4)

“The ALJ thus described to the VE a hypothetical person with less functional capacity (greater functional limitation) than Plaintiff possessed.” (9)

FACTUAL BACKGROUND

Plaintiff alleged disability beginning June 1, 2021, based on physical and mental conditions including low bone density, back problems, heart and breathing problems, anxiety, and insomnia. The ALJ found severe impairments consisting of anxiety disorder, schizophrenia, a learning disability, and obesity, but determined that Plaintiff retained the capacity for light work with additional restrictions and had no past relevant work. Although the ALJ's hypothetical to the vocational expert included use of a front-wheeled walker, the ALJ later found that the record did not establish a need for a walker; the vocational expert nevertheless testified that the same jobs remained available even with walker use.

PROCEDURAL HISTORY

Plaintiff applied for supplemental security income in June 2021. After a November 2023 administrative hearing, the ALJ determined on January 31, 2024, that Plaintiff was not disabled and could perform light work with limitations, including identified jobs existing in significant numbers in the national economy. The Appeals Council denied review on October 11, 2024. Plaintiff then filed this action, and the parties submitted cross-briefs; the court affirmed the Commissioner's decision.

DISPOSITION

affirmed

CASES CITED

- *Molina v. Astrue*, 674 F.3d 1104, 1110 (9th Cir. 2012)
- *Sisk v. Saul*, 820 F. App'x 604, 606 (9th Cir. 2020)
- *Tackett v. Apfel*, 180 F.3d 1094, 1098, 1100-01 (9th Cir. 1999)
- *Stout v. Commissioner, Social Security Administration*, 454 F.3d 1050, 1052 (9th Cir. 2006)
- *Burch v. Barnhart*, 400 F.3d 676, 679 (9th Cir. 2005)
- *Trevizo v. Berryhill*, 871 F.3d 664, 674-75 (9th Cir. 2017)
- *Rounds v. Commissioner of Social Security Administration*, 807 F.3d 996, 1002 (9th Cir. 2015)
- *Treichler v. Commissioner of Social Security Administration*, 775 F.3d 1090, 1099 (9th Cir. 2014)
- *Garrison v. Colvin*, 759 F.3d 995, 1009 (9th Cir. 2014)
- *Brown-Hunter v. Colvin*, 806 F.3d 487, 492 (9th Cir. 2015)
- *Marsh v. Colvin*, 792 F.3d 1170, 1173 (9th Cir. 2015)
- *Cooper v. Sullivan*, 880 F.2d 1152, 1155 n.5 (9th Cir. 1989)
- *Orn v. Astrue*, 495 F.3d 625, 630 (9th Cir. 2007)
- *Valentine v. Commissioner of Social Security Administration*, 574 F.3d 685, 690 (9th Cir. 2009)
- *Heckler v. Campbell*, 461 U.S. 458, 461-62 (1983)
- *Zavalin v. Colvin*, 778 F.3d 842, 845-46 (9th Cir. 2015)
- *Gutierrez v. Colvin*, 844 F.3d 804, 806-07 (9th Cir. 2016)
- *Osenbrock v. Apfel*, 240 F.3d 1157, 1162, 1165 (9th Cir. 2001)
- *Hill v. Astrue*, 698 F.3d 1153, 1161-62 (9th Cir. 2012)
- *Embrey v. Bowen*, 849 F.2d 418, 422 (9th Cir. 1988)
- *Robbins v. Social Security Administration*, 466 F.3d 880, 886 (9th Cir. 2006)
- *Leach v. Kijakazi*, 70 F.4th 1251, 1255, 1257 (9th Cir. 2023)
- *Felton v. Colvin*, 2015 WL 262953, at *12 (C.D. Cal. Jan. 21, 2015)
- *Barragan v. Colvin*, 2013 WL 5467430, at *6 (C.D. Cal. Sept. 30, 2013)
- *Morris v. Astrue*, 2013 WL 1000326, at *16 (D.R.I. Feb. 1, 2013)
- *Stain v. Astrue*, 2012 WL 1067867, at *6 (D. Me. Mar. 28, 2012)