

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Ibarra v. Commissioner of Social Security

Ibarra · No. 1:24-cv-01342-JLT-HBK · Decided September 2, 2025

SUMMARY

A magistrate judge of the U.S. District Court for the Eastern District of California recommends granting Blanca Ibarra’s motion for summary judgment, denying the Commissioner’s cross-motion, and remanding her Social Security disability benefits case for further administrative proceedings. The recommendation concludes that the ALJ failed to adequately account for or explain the rejection of moderate limitations assessed by consultative psychologist G.E. Washington, particularly limitations involving attendance, completing a workday or workweek, consistent work activity, and workplace stress. The court also directs the ALJ to reevaluate the medical opinion evidence, symptom claims, residual functional capacity, and step-five findings on remand.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Helena M. Barch-Kuchta
JURISDICTION	U.S. District Court for the Eastern District of California
DECIDED	September 2, 2025
DOCKET	1:24-cv-01342-JLT-HBK
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final denial of disability insurance benefits. The magistrate judge issued findings and recommendations recommending that Plaintiff's summary-judgment motion be granted, the Commissioner's cross-motion be denied, and the case be remanded for further administrative proceedings.
STANDARD OF REVIEW	Under 42 U.S.C. § 405(g), the court reviews the Commissioner's decision to determine whether it is supported by substantial evidence and free of legal error. The court must consider the entire record, may not substitute its judgment for the Commissioner's, and will uphold an ALJ's conclusion when the evidence is susceptible to more than one rational interpretation. Errors are reversible unless harmless.

PRECEDENTIAL VALUE	nonprecedential
PARTIES	Blanca Ibarra v. Commissioner of Social Security

TOPICS

judicial review of agency action agency adjudication administrative law disability definition
ada / disability

PRACTICE AREAS

Social Security disability administrative law federal judicial review disability benefits

QUESTIONS PRESENTED

1. Whether the ALJ adequately incorporated into the RFC the moderate limitations assessed by consultative psychologist G.E. Washington after finding that opinion persuasive.
2. Whether the ALJ properly considered Plaintiff's subjective symptom claims.

HOLDINGS

1. The ALJ erred by finding Dr. Washington's opinion persuasive but failing either to explain, with substantial-evidence-supported reasons, why the moderate limitations involving consistent work performance, completion of a normal workday or workweek, regular attendance, and dealing with ordinary competitive-work stress were rejected, or to incorporate those limitations adequately into the RFC.
2. Further administrative proceedings, rather than an immediate award of benefits, were appropriate because conflicting evidence and unresolved factual issues remained concerning the medical-opinion evidence, RFC, and vocational findings.
3. The court declined to resolve the subjective-symptom challenge in detail because reconsideration of the medical-opinion evidence required a new sequential evaluation, including reevaluation of Plaintiff's symptom claims.

KEY QUOTATIONS

"Here, the ALJ fails to identify the exact limitations assessed by Dr. Washington, nor does the ALJ explain with specificity how they are "persuasive" pursuant to the revised regulations." (at 10)

"Based on the foregoing, the Court finds the RFC limiting Plaintiff to "short, routine, and repetitive instructions," does not adequately account for Dr. Washington's findings of moderate limitations in Plaintiff's ability to perform work activities on a consistent basis, complete a normal workday/work week, maintain regular attendance in the workplace, and deal with the usual stresses encountered in competitive work." (at 11)

"Where," as here, "there is conflicting evidence, and not all essential factual issues have been resolved, a remand for an award of benefits is inappropriate." (at 13)

FACTUAL BACKGROUND

Blanca Ibarra applied for disability insurance benefits alleging limitations from back and leg pain, migraines, depression, and chronic pain. At the administrative hearing, she testified that she could lift only five to ten pounds, had limited abilities to walk, stand, and sit, experienced frequent headaches, and needed to lie down for several hours during an eight-hour day. The ALJ found severe migraine, lumbar-spine, anxiety, depression, and post-traumatic-stress impairments, assessed a restricted light-work RFC, and found at step five that Ibarra could perform jobs existing in significant numbers in the national economy.

PROCEDURAL HISTORY

Plaintiff applied for disability insurance benefits, was denied initially and on reconsideration, appeared at an administrative hearing, and received an unfavorable ALJ decision dated January 19, 2024. The Appeals Council denied review. In district court, Plaintiff moved for summary judgment and the Commissioner filed a cross-motion. The magistrate judge recommended reversal and sentence-four remand, subject to review by the assigned district judge after any objections.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

On remand, the ALJ must reconsider Dr. Washington's opinion and the relevant medical evidence; reevaluate Plaintiff's symptom claims; conduct a new five-step sequential analysis; reassess the RFC and step-five finding if necessary; order additional consultative examinations if appropriate; take additional testimony from medical experts if appropriate; and, if necessary, obtain additional vocational-expert testimony based on all limitations credited by the ALJ.

CASES CITED

- Hill v. Astrue, 698 F.3d 1153, 1158-59 (9th Cir. 2012)
- Tommasetti v. Astrue, 533 F.3d 1035, 1038 (9th Cir. 2008)
- Shinseki v. Sanders, 556 U.S. 396, 409-10 (2009)
- Tackett v. Apfel, 180 F.3d 1094, 1098 (9th Cir. 1999)
- Beltran v. Astrue, 700 F.3d 386, 389 (9th Cir. 2012)
- Woods v. Kijakazi, 32 F.4th 785, 787, 792 (9th Cir. 2022)
- Bayliss v. Barnhart, 427 F.3d 1211, 1217 (9th Cir. 2005)
- Turner v. Commissioner of Social Security, 613 F.3d 1217, 1222-23 (9th Cir. 2010)
- Reddick v. Chater, 157 F.3d 715, 725 (9th Cir. 1998)
- Brown-Hunter v. Colvin, 806 F.3d 487, 495 (9th Cir. 2015)
- Stubbs-Danielson v. Astrue, 539 F.3d 1169, 1174 (9th Cir. 2008)
- Rounds v. Commissioner of Social Security Administration, 807 F.3d 996, 1006 (9th Cir. 2015)

- Panziera v. Berryhill, 2018 WL 278623, at *20 (N.D. Cal. Jan. 3, 2018)
- Harrell v. Kijakazi, 2021 WL 4429416, at *6 (E.D. Cal. Sept. 27, 2021)
- Macias v. Saul, 2021 WL 856423, at *6 (E.D. Cal. Mar. 8, 2021)
- Berenisia Madrigal v. Saul, 2020 WL 58289, at *5-6 (E.D. Cal. Jan. 6, 2020)
- Millsap v. Kijakazi, 2023 WL 4534341, at *5-6 (E.D. Cal. July 13, 2023)
- Sahyoun v. Saul, 2020 WL 1492661, at *4 (E.D. Cal. Mar. 27, 2020)
- Messerli v. Berryhill, 2017 WL 3782986, at *11 (E.D. Cal. Aug. 31, 2017)
- Schmidt v. Colvin, 2013 WL 5372845, at *17 (E.D. Cal. Sept. 25, 2013)
- Robbins v. Social Security Administration, 466 F.3d 880, 886 (9th Cir. 2006)
- Byrd v. Colvin, 2017 WL 980559, at *8 (D. Or. Mar. 14, 2017)
- Stout v. Commissioner of Social Security Administration, 454 F.3d 1050, 1056 (9th Cir. 2006)
- Treichler v. Commissioner of Social Security Administration, 775 F.3d 1090, 1101, 1103-04 (9th Cir. 2014)
- Wilkerson v. Wheeler, 772 F.3d 834, 839 (9th Cir. 2014)