

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
NORTH CAROLINA, CHARLOTTE DIVISION

Christopher Ross Huffman v. Commissioner of Social Security

No. 1:24-CV-281-KDB-DCK (W.D.N.C. Feb. 17, 2026) · No. 1:24-CV-281-KDB-DCK · Decided February 17, 2026

SUMMARY

This memorandum and recommendation addresses Christopher Ross Huffman’s challenge to the Commissioner of Social Security’s denial of disability insurance and supplemental security income benefits. The magistrate judge recommends affirming the Commissioner’s decision, concluding that the ALJ properly evaluated Plaintiff’s seizure disorder, applicable listing criteria, residual functional capacity, and medical opinions under the substantial-evidence standard.

CASE DETAILS

COURT	United States District Court for the Western District of North Carolina, Charlotte Division
WRITING FOR THE COURT	David C. Keesler, United States Magistrate Judge
JURISDICTION	U.S. District Court for the Western District of North Carolina
DECIDED	February 17, 2026
DOCKET	1:24-CV-281-KDB-DCK
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. §§ 405(g) and 1383(c) (3) of the Commissioner's final decision denying his applications for disability insurance benefits and supplemental security income. The magistrate judge issued a memorandum and recommendation recommending that the Commissioner's decision be affirmed.
STANDARD OF REVIEW	The court reviews whether the Commissioner's decision is supported by substantial evidence and whether the correct legal standards were applied. The court may not reweigh the evidence, resolve evidentiary conflicts, or substitute its judgment for that of the Commissioner.
PRECEDENTIAL VALUE	nonprecedential
PARTIES	Christopher Ross Huffman v. Commissioner of Social Security

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QUESTIONS PRESENTED

1. Whether the ALJ erred by evaluating Huffman's seizure disorder under Listing 11.02 rather than Listing 12.07 and by failing to properly evaluate the paragraph B criteria and resulting RFC.
2. Whether the ALJ complied with 20 C.F.R. §§ 404.1520c and 416.920c when evaluating the medical opinions of Ronald Koenig, M.D., Gwyneth McCawley, M.D., Nathaniel Jablecki, M.D., and Shannon Mitchell, P.A.

HOLDINGS

1. The ALJ did not commit reversible error by evaluating Huffman's seizure disorder under Listing 11.02 rather than separately under Listing 12.07 because the ALJ considered the seizure-related symptoms while applying equivalent paragraph B criteria under Listings 12.04, 12.06, and 12.15.
2. The ALJ complied with 20 C.F.R. §§ 404.1520c and 416.920c by evaluating the persuasiveness of the medical opinions based principally on supportability and consistency and by explaining why some proposed limitations were persuasive while others were not.
3. The Commissioner's decision should be affirmed because the ALJ applied the correct legal standards and the factual findings were supported by substantial evidence.

KEY QUOTATIONS

“Substantial evidence has been defined as ‘more than a scintilla and [it] must do more than create a suspicion of the existence of a fact to be established. It means such relevant evidence as a reasonable mind might accept as adequate to support a conclusion.’” (Standard of Review)

“As such, the undersigned will recommend that the Commissioner’s decision be affirmed.” (Conclusion)

FACTUAL BACKGROUND

Huffman alleged that a crush injury to his left hand, seizure-like events or seizure disorder, migraines, and mental impairments prevented him from working. The ALJ found several severe impairments, determined that Huffman did not meet or medically equal a listed impairment, and assessed a residual functional capacity for a restricted range of light work. Although Huffman could not perform his past work as a cook helper, the vocational expert identified other jobs existing in significant numbers that he could perform.

PROCEDURAL HISTORY

Huffman applied for Title II and Title XVI disability benefits, alleging disability beginning July 1, 2021. The Social Security Administration denied the applications initially and on reconsideration. After two administrative hearings, the ALJ denied benefits on August 9, 2024, and the Appeals Council denied review on October 11,

2024. Huffman filed this action on November 15, 2024; after briefing, the magistrate judge recommended affirmance.

DISPOSITION

other

CASES CITED

- Richardson v. Perales, 402 U.S. 389, 390, 401 (1971)
- Hays v. Sullivan, 907 F.2d 1453, 1456 (4th Cir. 1990)
- Smith v. Schweiker, 795 F.2d 343, 345 (4th Cir. 1986)
- Hancock v. Astrue, 667 F.3d 470, 472 (4th Cir. 2012)
- Smith v. Heckler, 782 F.2d 1176, 1179 (4th Cir. 1986)
- King v. Califano, 599 F.2d 597, 599 (4th Cir. 1979)
- Seacrist v. Weinberger, 538 F.2d 1054, 1056-57 (4th Cir. 1976)
- Peace v. Berryhill, 2019 WL 2406626, at *1 (4th Cir. June 7, 2019)
- Brown v. Commissioner of Social Security Administration, 873 F.3d 251, 267 (4th Cir. 2017)
- Lester v. Schweiker, 683 F.2d 838, 841 (4th Cir. 1982)
- Bowen v. Yuckert, 482 U.S. 137, 146 n.5 (1987)
- Pass v. Chater, 65 F.3d 1200, 1203 (4th Cir. 1995)
- Miller v. Saul, No. 1:18-CV-350-RJC-DSC, 2019 WL 7372706, at *4 (W.D.N.C. Dec. 30, 2019)
- Wheeler v. Saul, 2019 WL 4565260, at *4 (M.D.N.C. Sept. 20, 2019)
- Thomas v. Berryhill, 916 F.3d 176, 189 (4th Cir.)
- Monroe v. Colvin, 826 F.3d 176, 189 (4th Cir. 2016)
- Alaska Department of Environmental Conservation v. EPA, 540 U.S. 461, 497 (2004)
- Mascio v. Colvin, 780 F.3d 632, 637 (4th Cir. 2015)
- Victor R. v. Colvin, No. 1:24-CV-205, 2025 WL 33699, at *4 (M.D.N.C. Jan. 6, 2025)
- Hoglen v. Saul, No. 1:20-CV-061-MOC-WCM, 2021 WL 521211, at *2 (W.D.N.C. Jan. 22, 2021)
- Fagan v. Kijakazi, No. 1:20CV706, 2021 WL 5566481, at *7 (M.D.N.C. Nov. 29, 2021)
- Jackson v. Astrue, 467 F. App'x 214, 216 (4th Cir.)
- Linger v. Commissioner of Social Security, 2025 WL 40548, at *6 (4th Cir. Jan. 7, 2025)
- Wykle v. Saul, No. 1:19-CV-155-MOC, 2020 WL 697445, at *6 (W.D.N.C. Feb. 11, 2020)
- Turner v. Commissioner, 2024 WL 2764722, at *5 (4th Cir. May 30, 2024)
- Payne v. Commissioner of Social Security, No. 1:20-CV-223-RJC, 2022 WL 680225, at *2 (W.D.N.C. Mar. 7, 2022)
- Parker v. Saul, 2021 WL 2546718, at *2 (E.D.N.C. June 21, 2021)
- Diamond v. Colonial Life, 416 F.3d 310, 315-16 (4th Cir. 2005)
- United States v. Benton, 523 F.3d 424, 428 (4th Cir. 2008)

- Martin v. Duffy, 858 F.3d 239, 245 (4th Cir. 2017)
- United States v. Midgette, 478 F.3d 616, 622 (4th Cir. 2007)

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