

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
GEORGIA, ALBANY DIVISION

M.J.S. v. Commissioner of Social Security

No. 1:25-cv-18 (LAG) (M.D. Ga. Dec. 16, 2025) · No. 1:25-cv-18 (LAG) · Decided December 16, 2025

SUMMARY

The magistrate judge recommends affirming the Commissioner of Social Security’s final decision denying M.J.S.’s application for disability benefits. The recommendation concludes that the administrative law judge applied the correct legal standards and that the decision was supported by substantial evidence, including the evaluation of medical opinions, subjective complaints, and alleged gastrointestinal limitations. The parties were notified of the fourteen-day period for filing objections.

CASE DETAILS

COURT	United States District Court for the Middle District of Georgia, Albany Division
WRITING FOR THE COURT	Alfreda L. Sheppard
JURISDICTION	United States District Court for the Middle District of Georgia, Albany Division
DECIDED	December 16, 2025
DOCKET	1:25-cv-18 (LAG)
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. §§ 405(g) and 1383(c) of the Commissioner's final decision denying Disability Insurance Benefits. The magistrate judge recommends affirmance under sentence four of § 405(g).
STANDARD OF REVIEW	The court reviews whether substantial evidence supports the Commissioner's decision and whether the correct legal standards were applied. Factual findings are conclusive when supported by substantial evidence, meaning more than a scintilla and such relevant evidence as a reasonable person would accept as adequate. Legal conclusions are not presumed valid, and failure to apply the correct law or provide sufficient reasoning requires reversal.
PRECEDENTIAL VALUE	Unknown; magistrate judge's report and recommendation in a district-court Social Security action

TOPICS

judicial review of agency action

exhaustion of remedies

administrative law

civil procedure

PRACTICE AREAS

Social Security disability

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether substantial evidence supported the ALJ's residual-functional-capacity assessment and finding that Plaintiff was not disabled.
2. Whether the ALJ properly evaluated the Blankenship Center RFC assessment and Dr. Ojelade's psychological evaluation.
3. Whether the ALJ adequately considered Plaintiff's subjective complaints, including alleged diarrhea and frequent bathroom needs.
4. Whether Simon and Pupo required reversal or remand.

HOLDINGS

1. The Commissioner's decision is supported by substantial evidence and applied the correct legal standards; affirmance under sentence four of 42 U.S.C. § 405(g) is warranted.
2. Pointing to evidence that could support a different result does not establish reversible error; the claimant must show the absence of substantial evidence supporting the ALJ's conclusion.
3. The Commissioner evaluates disability claims through the five-step sequential process prescribed by 20 C.F.R. § 404.1520, with the claimant bearing the burden through step four and the Commissioner bearing a limited burden at step five.

KEY QUOTATIONS

“the ‘issue before [the Court] is whether there was substantial evidence to support the [ALJ’s] decision, not whether there could be substantial evidence in the record to support a different decision.’” (Discussion)

“As the Commissioner’s decision that Plaintiff was not disabled is supported by substantial evidence, it is RECOMMENDED that the Commissioner’s decision be AFFIRMED pursuant to Sentence Four of § 405(g).” (Conclusion)

FACTUAL BACKGROUND

Plaintiff alleged disability based principally on lumbar degenerative disc disease with radiculopathy, osteoarthritis, PTSD, anxiety, and related symptoms. The ALJ found severe impairments involving the lumbar spine, osteoarthritis, PTSD, and anxiety, but determined that Plaintiff retained the residual functional capacity for a restricted range of light work and could perform other jobs existing in significant numbers in the national

economy. The administrative record included evidence of lumbar limitations and pain but also generally normal or near-normal gait, strength, mobility, and examinations, as well as evaluations questioning the consistency or validity of Plaintiff's reported limitations.

PROCEDURAL HISTORY

Plaintiff applied for Disability Insurance Benefits on February 18, 2020, alleging disability beginning November 3, 2019. An ALJ initially found him not disabled, the Appeals Council vacated that decision and remanded, and a second ALJ again found him not disabled on August 14, 2024. The Appeals Council denied review on January 3, 2025, making the ALJ's second decision final. Plaintiff filed this action on January 28, 2025; after a delayed brief and an order to show cause, the magistrate judge concluded that substantial evidence supported the Commissioner's decision and recommended affirmance.

DISPOSITION

affirmed

CASES CITED

- *Wilson v. Barnhart*, 284 F.3d 1219, 1221 (11th Cir. 2002)
- *Brito v. Commissioner, Social Security Administration*, 687 F. App'x 801, 803 (11th Cir. 2017)
- *Lewis v. Barnhart*, 285 F.3d 1329, 1330 (11th Cir. 2002)
- *Lewis v. Callahan*, 125 F.3d 1436, 1440 (11th Cir. 1997)
- *Cornelius v. Sullivan*, 936 F.2d 1143, 1145-46 (11th Cir. 1991)
- *Bloodsworth v. Heckler*, 703 F.2d 1233, 1239 (11th Cir. 1983)
- *Goode v. Commissioner of Social Security*, 966 F.3d 1277, 1278-79 (11th Cir. 2020)
- *Simon v. Commissioner, Social Security Administration*, 7 F.4th 1094 (11th Cir. 2021)
- *Pupo v. Commissioner, Social Security Administration*, 17 F.4th 1054, 1064-65 (11th Cir. 2021)
- *Glover v. Commissioner, Social Security Administration*, No. 22-10497, 2022 WL 17826364, at *3 n.2 (11th Cir. Dec. 21, 2022)
- *Harner v. Social Security Administration, Commissioner*, 38 F.4th 892, 894 (11th Cir. 2022)
- *Rodriguez ex rel. R.C. v. Berryhill*, No. 20-14458, 2021 WL 5023951, at *7 (11th Cir. Oct. 29, 2021)
- *Shinn ex rel. Shinn v. Commissioner of Social Security*, 391 F.3d 1276, 1282 (11th Cir. 2004)
- *Sims v. Commissioner of Social Security*, 706 F. App'x 595, 604 (11th Cir. 2017)
- *Barnes v. Sullivan*, 932 F.2d 1356, 1358 (11th Cir. 1991)

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