

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

Charles M. v. Commissioner of Social Security

Charles M. · No. Civil Action No. 25-200; 2:25-cv-00200 · Decided March 17, 2026

SUMMARY

The United States District Court for the District of New Jersey reviewed a denial of disability insurance benefits and supplemental security income. The court held that the Administrative Law Judge did not adequately explain how the evidence supported the residual functional capacity assessment, preventing meaningful judicial review. The court vacated the decision and remanded for further proceedings.

CASE DETAILS

COURT	United States District Court for the District of New Jersey
WRITING FOR THE COURT	Claire C. Cecchi
JURISDICTION	United States District Court for the District of New Jersey
DECIDED	March 17, 2026
DOCKET	Civil Action No. 25-200; 2:25-cv-00200
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under the Social Security Act of the Commissioner's final decision denying disability insurance benefits and supplemental security income. The district court vacated the Administrative Law Judge's decision and remanded for further proceedings.
STANDARD OF REVIEW	The court reviewed the Commissioner's decision under 42 U.S.C. §§ 405(g) and 1383(c)(3) for substantial evidence and legal error. It could not reweigh the evidence or substitute its factual determinations, but was required to review the record as a whole and determine whether the ALJ's conclusions were rational and supported by substantial evidence.
PRECEDENTIAL VALUE	unpublished, nonprecedential
PARTIES	Charles M. v. Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

disability definition

PRACTICE AREAS

Social Security disability

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QUESTIONS PRESENTED

1. Whether the ALJ adequately explained the residual functional capacity assessment and its consistency with Plaintiff's testimony and the medical evidence.
2. Whether the ALJ's decision was supported by substantial evidence under the Social Security Act.

HOLDINGS

1. The ALJ's RFC assessment was inadequately explained because the decision summarized treatment records without explaining how the evidence was inconsistent with Plaintiff's testimony or supported the specific sedentary-work limitations.
2. The decision could not be upheld because the inadequate explanation of the RFC assessment prevented meaningful review of whether the ALJ's findings were supported by substantial evidence.

KEY QUOTATIONS

"The failure to provide an adequate explanation precludes a court from meaningfully reviewing the ALJ's RFC assessment and warrants vacating the decision and remanding for further proceedings." (Discussion § IV.B)

"The ALJ's decision does not permit meaningful review of his RCF assessment." (Discussion § IV.B)

"But the ALJ then went on to merely summarize Plaintiff's treatment records without explaining how this evidence was inconsistent with Plaintiff's testimony regarding Plaintiff's limitations or how that evidence supported the RFC assessment." (Discussion § IV.B)

FACTUAL BACKGROUND

Plaintiff, a 50-year-old man with a high school education and prior work as a clerical worker and grocery deliverer, alleged disability based principally on left-hip osteoarthritis, right-knee disorders, a right rotator-cuff tear, obesity, and lumbar-spine pain. He testified that he could sit for fewer than 15 minutes, stand unsupported for 15 minutes, and walk for 10 minutes before needing to stop because of pain, and that he needed to lie down during the day and sometimes elevate his leg. The ALJ nevertheless found that Plaintiff retained the residual functional capacity for sedentary work with additional limitations, and that he could perform past relevant work as a clerical worker or other work existing in significant numbers.

PROCEDURAL HISTORY

Plaintiff applied for disability insurance benefits and supplemental security income, alleging disability beginning September 1, 2021. The applications were denied initially and on reconsideration. After a hearing, the ALJ issued a decision on March 20, 2024, finding Plaintiff not disabled; the Appeals Council denied review,

according to the opinion, and Plaintiff filed this action on January 8, 2025. The district court granted the appeal, vacated the ALJ's decision, and remanded.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The matter was remanded for further proceedings consistent with the Opinion. The ALJ must provide an adequate explanation connecting the evidence, including Plaintiff's testimony and treatment records, to the RFC assessment and the resulting disability determination.

CASES CITED

- Chandler v. Comm'r of Soc. Sec., 667 F.3d 356, 359 (3d Cir. 2011)
- Gober v. Matthews, 574 F.2d 772, 776 (3d Cir. 1978)
- Daniels v. Astrue, No. 08-1676, 2009 WL 1011587, at *2 (M.D. Pa. Apr. 15, 2009)
- Consolo v. Fed. Mar. Comm'n, 383 U.S. 607, 620 (1966)
- Cruz v. Comm'r of Soc. Sec., 244 F. App'x 475, 479 (3d Cir. 2007)
- Sykes v. Apfel, 228 F.3d 259, 262–263 (3d Cir. 2000)
- Heckler v. Campbell, 461 U.S. 458, 467 (1983)
- Hess v. Comm'r Soc. Sec., 931 F.3d 198, 202 (3d Cir. 2019)
- Ramirez v. Barnhart, 372 F.3d 546, 555 (3d Cir. 2004)
- Mays v. Barnhart, 78 F. App'x 808, 812 (3d Cir. 2003)
- Cotter v. Harris, 642 F.2d 700, 704 (3d Cir. 1981)
- Collins v. Kijakazi, No. 20-1206, 2022 WL 1697376, at *8 (M.D. Pa. May 26, 2022)
- Fargnoli v. Massanari, 247 F.3d 34, 43 (3d Cir. 2001)
- Robert M. v. Kijakazi, No. 22-1476, 2023 WL 5839299, at *5 (M.D. Pa. Aug. 7, 2023)
- Dixon v. Comm'r of Soc. Sec., No. 19-10205, 2020 WL 4696746, at *2 (D.N.J. Aug. 13, 2020)
- Laura F. v. Dudek, No. 23-68, 2025 WL 1111311, at *10 (D.N.J. Apr. 15, 2025)
- Jeff H. v. Comm'r of Soc. Sec., No. 23-21384, 2024 WL 3873937, at *5 (D.N.J. Aug. 20, 2024)
- Spadaccini v. Comm'r of Soc. Sec., No. 12-6246, 2013 WL 6054605, at *3 (D.N.J. Nov. 15, 2013)
- Kennedy v. Saul, No. 19-267, 2020 WL 5775179, at *4 (W.D. Pa. Sept. 28, 2020)
- Ramos v. Kijakazi, No. 20-2415, 2022 WL 3021375, at *5 (M.D. Pa. July 29, 2022)
- Koshir v. Kijakazi, No. 20-1441, 2022 WL 992529, at *4 (W.D. Pa. Mar. 31, 2022)
- Bryan S. v. Kijakazi, No. 20-cv-11145, 2022 WL 2916072, at *1 n.1 (D.N.J. July 25, 2022)