

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Sara F. v. Frank Bisignano, Commissioner of Social Security

No. CV 25-06001-DFM, United States District Court for the Central District of California (January 21, 2026)

SUMMARY

The United States District Court for the Central District of California reviews the denial of Sara F.’s application for supplemental security income. The court holds that the administrative law judge provided specific, clear, and convincing reasons supported by substantial evidence for discounting Plaintiff’s subjective symptom testimony, affirms the denial of benefits, and dismisses the action with prejudice.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Douglas F. McCormick
JURISDICTION	United States District Court for the Central District of California
DECIDED	January 21, 2026
DOCKET	CV 25-06001-DFM
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review of the Commissioner of Social Security's denial of her application for supplemental security income, challenging the administrative law judge's evaluation of her subjective symptom testimony.
STANDARD OF REVIEW	The district court may set aside the denial of benefits only if it is unsupported by substantial evidence or based on legal error. The court reviews the existing administrative record, defers to the ALJ's rational interpretation of the evidence, and reviews the ALJ's evaluation of subjective symptom testimony under the clear-and-convincing-reasons standard when applicable.
PRECEDENTIAL VALUE	Unpublished district court memorandum opinion; precedential status is not specified in the opinion.
PARTIES	Sara F. v. Frank Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

ada / disability

PRACTICE AREAS

Social Security disability benefits

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ properly evaluated and discounted Plaintiff's subjective symptom testimony concerning the severity and limiting effects of her back and shoulder pain.

HOLDINGS

1. The ALJ properly discounted Plaintiff's testimony regarding the severity and limiting effects of her symptoms because the testimony was inconsistent with the objective medical evidence and her course of treatment.

KEY QUOTATIONS

"A district court will set aside a denial of benefits only if "it is either not supported by substantial evidence or is based upon legal error."" (Legal Standard)

"Once the claimant "has presented objective medical evidence of an underlying impairment which could reasonably be expected to produce the pain or other symptoms alleged," then, absent evidence of malingering, "the ALJ can reject the claimant's testimony about the severity of her symptoms only by offering specific, clear and convincing reasons for doing so."" (Discussion)

"Here, the ALJ gave at least two clear and convincing reasons, supported by substantial evidence, for discounting Plaintiff's testimony." (Discussion)

FACTUAL BACKGROUND

Sara F. alleged disability beginning in 2018 based principally on back and right shoulder symptoms following a motor vehicle accident. The ALJ found severe impairments of degenerative disc disease and right shoulder strain, but determined that Plaintiff retained the residual functional capacity for light work with limitations on overhead reaching and postural activities. The administrative record contained no evidence of treatment for back or shoulder pain before 2022 or from treating providers, and consultative examinations showed generally normal or mildly limited findings. Plaintiff testified that pain and related symptoms prevented prolonged standing and lifting more than ten pounds, but she had not received injections, pain medication, imaging, physical therapy, or specialist treatment.

PROCEDURAL HISTORY

Sara F. applied for supplemental security income in November 2022. The Commissioner denied the application initially and on reconsideration, and an administrative law judge issued an unfavorable decision after a hearing on August 8, 2024. The Appeals Council denied review, after which Plaintiff filed this action in the district court. The court affirmed the agency's denial and dismissed the action with prejudice.

DISPOSITION

affirmed

CASES CITED

- Luther v. Berryhill, 891 F.3d 872, 875 (9th Cir. 2018)
- Biestek v. Berryhill, 587 U.S. 97, 102-03, 108 (2019)
- Burch v. Barnhart, 400 F.3d 676, 679 (9th Cir. 2005)
- Trevizo v. Berryhill, 871 F.3d 664, 678 (9th Cir. 2017)
- Reddick v. Chater, 157 F.3d 715, 722 (9th Cir. 1998)
- Brown-Hunter v. Colvin, 806 F.3d 487, 493 (9th Cir. 2015)
- Smartt v. Kijakazi, 53 F.4th 489, 498-99 (9th Cir. 2022)
- Tommasetti v. Astrue, 533 F.3d 1035, 1039 (9th Cir. 2008)
- Meanel v. Apfel, 172 F.3d 1111, 1114 (9th Cir. 1999)
- Treichler v. Commissioner of Social Security Administration, 775 F.3d 1090, 1102 (9th Cir. 2014)
- Baker v. Saul, 836 F. App'x 526, 530 (9th Cir. 2020)
- Carmickle v. Commissioner of Social Security Administration, 533 F.3d 1155, 1162 (9th Cir. 2008)
- Smartt v. Kijakazi, 53 F.4th 489, 499 (9th Cir. 2022)