

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
NEW YORK

Lyric R. v. Commissioner of Social Security

Lyric R. · No. 1:25-cv-00234 (MAD/MJK) · Decided January 13, 2026

SUMMARY

The United States District Court for the Northern District of New York adopts a magistrate judge's recommendation in a Social Security disability benefits action. The court grants the plaintiff's motion, denies the Commissioner's motion, and remands the benefits decision under sentence four of 42 U.S.C. § 405(g) for further administrative proceedings. The court finds errors in the evaluation of the plaintiff's migraines, daily activities, and medical opinions.

CASE DETAILS

COURT	United States District Court for the Northern District of New York
WRITING FOR THE COURT	Mae A. D'Agostino
JURISDICTION	United States District Court for the Northern District of New York
DECIDED	January 13, 2026
DOCKET	1:25-cv-00234 (MAD/MJK)
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought review under 42 U.S.C. §§ 405(g) and 1383(c)(3) of the Commissioner's denial of supplemental security income and disability insurance benefits. The parties filed briefs treated as motions under Federal Rule of Civil Procedure 12(c). The court reviewed the magistrate judge's report and recommendation for clear error because neither party filed objections.
STANDARD OF REVIEW	The court reviewed the unobjected-to magistrate judge's recommendations for clear error and reviewed the Commissioner's disability determination under the substantial-evidence standard. The court also considered whether the ALJ adequately explained the reasoning supporting the decision to permit meaningful judicial review.
PRECEDENTIAL VALUE	unpublished district court order; persuasive authority only
PARTIES	Lyric R. v. Commissioner of Social Security

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QUESTIONS PRESENTED

1. Whether the ALJ's evaluation of Plaintiff's migraines and headache-related limitations was supported by substantial evidence.
2. Whether the ALJ mischaracterized Plaintiff's reported daily activities and physical abilities and failed to build a logical bridge between those activities and the ability to perform full-time work.
3. Whether the ALJ adequately evaluated the persuasiveness of competing medical opinions under 20 C.F.R. §§ 404.1520c and 416.920c.
4. Whether the ALJ was required to explicitly discuss Plaintiff's ECOG performance scores.

HOLDINGS

1. The ALJ's conclusion that Plaintiff's migraines were well managed and controlled was not supported by substantial evidence because the ALJ failed to identify specific record evidence supporting that conclusion and improperly focused on objective evidence while disregarding other evidence concerning the severity and effects of the headaches.
2. The ALJ's decision was not supported by substantial evidence to the extent it relied on erroneous or overstated descriptions of Plaintiff's lifting ability, dexterity, cooking, and ability to change cat litter.
3. The ALJ failed to explain how Plaintiff's routine activities demonstrated an ability to perform full-time employment and therefore failed to create a logical bridge between the evidence and the conclusion that Plaintiff was not disabled.
4. The ALJ failed to properly evaluate the persuasiveness of the medical opinions because the decision did not indicate that the ALJ considered the providers' relationships with Plaintiff, medical specialties, or relative expertise, and inadequately explained the asserted supportability and consistency of the opinions.
5. The ALJ was required to consider Plaintiff's ECOG performance scores as part of the complete case record but was not required to mention them explicitly in the written decision.

KEY QUOTATIONS

“put blinders on, examined only the objective medical evidence, and refused to acknowledge other parts of the record.” (Dkt. No. 16 at 8)

“it is unclear what the ALJ reviewed to determine that Lyric's migraines were 'well managed and controlled with medication.’” (Dkt. No. 16 at 9)

“create a logical bridge of reasoning” (Dkt. No. 16 at 12)

FACTUAL BACKGROUND

Plaintiff sought SSI and DIB based primarily on disabling migraines, headaches, dizziness, and related limitations. The ALJ characterized Plaintiff's headaches as well managed and controlled, relied on daily activities and selected medical opinions in finding her not disabled, and discounted treating neurologist Dr. Kumar's opinion that Plaintiff could not work. The record indicated daily headaches, increased medication needs, sleep disruption, inability to drive because of dizziness, and limitations affecting cooking and lifting.

PROCEDURAL HISTORY

The Commissioner denied Plaintiff's applications for SSI and DIB. Magistrate Judge Mitchell Katz recommended granting Plaintiff's motion, denying Defendant's motion, and remanding for further administrative proceedings. The district court found no clear error, adopted the Report-Recommendation in its entirety, granted Plaintiff's motion, denied Defendant's motion, remanded under sentence four of 42 U.S.C. § 405(g), and directed entry of judgment for Plaintiff.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Commissioner's decision is remanded pursuant to sentence four of 42 U.S.C. § 405(g) for further administrative proceedings consistent with the order, including proper evaluation of Plaintiff's migraines, reported limitations and daily activities, and medical-opinion evidence.

CASES CITED

- Coleman v. Hanuszcak, No. 5:16-CV-735, 2016 WL 4523918, at *1 (N.D.N.Y. Aug. 22, 2016)
- Petersen v. Astrue, 2 F. Supp. 3d 223, 229 (N.D.N.Y. 2012)
- Biestek v. Berryhill, 587 U.S. 97, 99, 102-03 (2019)
- Consolidated Edison Co. v. NLRB, 305 U.S. 197, 229 (1938)
- Williams v. Bowen, 859 F.2d 255, 258 (2d Cir. 1988)
- Brown v. Colvin, No. 5:14-cv-725, 2015 WL 4488670, at *4 (N.D.N.Y. July 22, 2015)
- Selian v. Astrue, 708 F.3d 409, 417-18 (2d Cir. 2013)
- Dodson v. Berryhill, No. 6:16-CV-0597, 2017 WL 2838167, at *9-10 (N.D.N.Y. June 30, 2017)
- Renee M. B. v. Commissioner of Social Security, No. 1:19-cv-00922, 2021 WL 716704, at *6 (W.D.N.Y. Feb. 24, 2021)
- Brown v. Commissioner of Social Security, No. 06-CV-3174, 2011 WL 1004696, at *5 (E.D.N.Y. Mar. 18, 2011)
- Woodford v. Apfel, 93 F. Supp. 2d 521, 529 (S.D.N.Y. 2000)

- Jennifer A. v. Commissioner of Social Security, No. 1:22-CV-1167, 2023 WL 8654215, at *4 (N.D.N.Y. Dec. 13, 2023)
- Jessica L.M. v. Commissioner of Social Security, No. 5:24-CV-00403, 2025 WL 1994917, at *11 (N.D.N.Y. June 9, 2025)
- Durakovic v. Colvin, No. 3:12-CV-6, 2014 WL 1293427, at *8 (N.D.N.Y. Mar. 31, 2014)

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