

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Urzua v. Commissioner of Social Security

Urzua · No. 2:23-cv-02772-EFB · Decided February 20, 2025

SUMMARY

The United States District Court for the Eastern District of California reviewed the denial of Jose Urzua’s application for Social Security disability insurance benefits. The court held that the administrative law judge failed to adequately account for limitations associated with ulcerative colitis, including frequent bathroom breaks, fecal urgency, and accidents, in determining residual functional capacity. The court granted plaintiff’s motion for summary judgment, denied the Commissioner’s cross-motion, and remanded for further administrative proceedings under sentence four of 42 U.S.C. § 405(g).

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Edmund F. Brennan
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	February 20, 2025
DOCKET	2:23-cv-02772-EFB
DISPOSITION	remanded
PROCEDURAL POSTURE	Action for judicial review of the Commissioner's final decision denying disability insurance benefits; the parties filed cross-motions for summary judgment.
STANDARD OF REVIEW	The court upholds the Commissioner's decision if it is supported by substantial evidence and the Commissioner applied the proper legal standards. Substantial evidence is more than a mere scintilla but less than a preponderance and is evidence a reasonable mind might accept as adequate to support a conclusion.
PRECEDENTIAL VALUE	unpublished district court order; precedential status unknown
PARTIES	Jose Urzua v. Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

remedies

PRACTICE AREAS

Social Security disability

administrative law

federal judicial review

QUESTIONS PRESENTED

1. Whether the ALJ erred by failing to translate assessed mild mental limitations into the residual functional capacity.
2. Whether the ALJ adequately considered the evidence of ulcerative colitis and associated bathroom-related limitations when formulating the physical residual functional capacity for the relevant period.
3. Whether remand for further administrative proceedings or an award of benefits was appropriate.

HOLDINGS

1. The ALJ did not err by omitting additional mental limitations from the RFC because the ALJ adequately considered the mild mental findings and substantial evidence supported the resulting mental RFC.
2. The ALJ erred by failing to substantively consider the functional effects of ulcerative colitis, including frequent bathroom breaks, fecal urgency, and occasional accidents, in formulating the RFC.
3. Remand for further administrative proceedings was appropriate because the record left open whether Urzua was disabled during the relevant period.

KEY QUOTATIONS

“an RFC that fails to take into account a claimant’s limitations is defective.” (at 11)

“Here, the record as a whole leaves open whether plaintiff was disabled during the relevant period and remand is the appropriate remedy.” (at 12)

FACTUAL BACKGROUND

Urzua alleged disability from Crohn's disease, colitis, and severe ulcerative disease beginning August 1, 2020. During the relevant period, he reported frequent urgent bowel movements, fecal urgency and incontinence, rectal bleeding, pain, fatigue, and a need for unscheduled bathroom breaks. Although he briefly returned to full-time work in November 2021, the record reflected continuing gastrointestinal symptoms and treatment, including reports of worsening urgency, incontinence, and soiling in October 2021.

PROCEDURAL HISTORY

Urzua applied for disability insurance benefits alleging disability beginning August 1, 2020. The application was denied initially and on reconsideration. After a January 3, 2022 telephonic hearing, the ALJ issued an unfavorable decision on July 7, 2022, finding that Urzua was not disabled and could perform past relevant work as an interpreter. The district court granted Urzua's motion for summary judgment, denied the Commissioner's cross-motion, and remanded for further administrative proceedings under sentence four of 42 U.S.C. § 405(g).

DISPOSITION

remanded

REMAND INSTRUCTIONS

On remand, the ALJ must consider the evidence regarding Urzua's ulcerative colitis and associated limitations when determining the RFC. The court did not direct the ALJ to credit any particular opinion or testimony and left the weighing of evidence and resolution of ambiguities or inconsistencies to the agency.

CASES CITED

- Bowen v. Yuckert, 482 U.S. 137, 140-42, 146 n.5 (1987)
- Lester v. Chater, 81 F.3d 821, 828 n.5 (9th Cir. 1995)
- Schneider v. Commissioner of the SSA, 223 F.3d 968, 973 (9th Cir. 2000)
- Morgan v. Commissioner of the SSA, 169 F.3d 595, 599 (9th Cir. 1999)
- Tackett v. Apfel, 180 F.3d 1094, 1097 (9th Cir. 1999)
- Miller v. Heckler, 770 F.2d 845, 847 (9th Cir. 1985)
- Saelee v. Chater, 94 F.3d 520, 521 (9th Cir. 1996)
- Richardson v. Perales, 402 U.S. 389, 401 (1971)
- Consolidated Edison Co. v. NLRB, 305 U.S. 197, 229 (1938)
- Edlund v. Massanari, 253 F.3d 1152, 1156 (9th Cir. 2001)
- Thomas v. Barnhart, 278 F.3d 947, 954 (9th Cir. 2002)
- Valencia v. Heckler, 751 F.2d 1082, 1085 (9th Cir. 1985)
- Rania v. Kijakazi, No. 2:20-cv-01541 MCE CKD, 2021 WL 5771663, at *3 (E.D. Cal. Dec. 6, 2021)
- D.L.P. v. Kijakazi, 2022 WL 4472064, at *2-*4 (N.D. Cal. Sept. 26, 2022)
- Hutton v. Astrue, 491 F. App'x 850, 851 (9th Cir. 2012)
- Hilda v. Kijakazi, 2023 WL 1107867, at *3 (C.D. Cal. Jan. 30, 2023)
- Tyson v. Kijakazi, No. 1:21-cv-00688 BAM, 2023 WL 2313192, at *4-*5 (E.D. Cal. Mar. 1, 2023)
- Pugh v. Kijakazi, No. 2:20-cv-02255 WBS CKD (SS), 2022 WL 1782517, at *5 (E.D. Cal. June 1, 2022), report and recommendation adopted, 2022 WL 3358091 (E.D. Cal. Aug. 15, 2022)
- Woods v. Kijakazi, 32 F.4th 785, 794 (9th Cir. 2022)
- Holohan v. Massanari, 246 F.3d 1195, 1205 (9th Cir. 2001)
- Garrison v. Colvin, 759 F.3d 995, 1017 n.23, 1020-21 (9th Cir. 2014)
- Lisa D. v. Kijakazi, 2023 WL 5501215, at *13 (S.D. Cal. Aug. 25, 2023)
- Treichler v. Commissioner of Social Security Administration, 775 F.3d 1090, 1103, 1105 (9th Cir. 2014)
- McAllister v. Sullivan, 888 F.2d 599, 603 (9th Cir. 1989)
- Dominguez v. Colvin, 808 F.3d 403, 407 (9th Cir. 2015)

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