

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
OHIO, EASTERN DIVISION

Gregory A. Gaubatz v. Commissioner of Social Security

No. 1:25-CV-00806-CEH (N.D. Ohio Dec. 1, 2025) · No. 1:25-CV-00806-CEH · Decided December 1, 2025

SUMMARY

The United States District Court for the Northern District of Ohio reviews the Commissioner of Social Security’s denial of Gregory A. Gaubatz’s applications for disability benefits. The court concludes that the ALJ failed to properly evaluate Gaubatz’s subjective symptom allegations concerning gout flare-ups and failed to build an accurate and logical bridge between the evidence and the residual functional capacity finding. The court reverses the nondisability determination and remands the matter under Sentence Four of 42 U.S.C. § 405(g).

CASE DETAILS

COURT	United States District Court for the Northern District of Ohio, Eastern Division
WRITING FOR THE COURT	Carmen E. Henderson
JURISDICTION	United States District Court for the Northern District of Ohio, Eastern Division
DECIDED	December 1, 2025
DOCKET	1:25-CV-00806-CEH
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Gaubatz sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying his applications for SSI and DIB for specified periods. The parties consented to disposition by a United States magistrate judge under 28 U.S.C. § 636(c) and Federal Rule of Civil Procedure 73.
STANDARD OF REVIEW	The court reviews whether the Commissioner's decision is supported by substantial evidence and was made pursuant to proper legal standards. Substantial evidence is more than a scintilla but less than a preponderance and is such relevant evidence as a reasonable mind might accept as adequate. The court may not uphold an ALJ decision when the reasons given fail to build an accurate and logical bridge between the evidence and the result.

PRECEDENTIAL VALUE	unpublished
PARTIES	Gregory A. Gaubatz v. Commissioner of Social Security

TOPICS

judicial review of agency action administrative law disability definition

PRACTICE AREAS

Social Security disability administrative law judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ complied with SSR 16-3p and applicable regulations when evaluating Gaubatz's subjective complaints concerning the severity and frequency of gout flare-ups.
2. Whether the ALJ provided sufficiently specific reasons and an accurate and logical bridge between the evidence and the rejection of Gaubatz's symptom testimony.
3. Whether the appropriate remedy was an immediate award of benefits or remand for further administrative proceedings.

HOLDINGS

1. The ALJ reversibly erred by failing to provide specific, adequately explained reasons for discounting Gaubatz's testimony about the severity and frequency of his gout symptoms and by failing to build an accurate and logical bridge between the evidence and the RFC finding.
2. Remand for further administrative proceedings, rather than an immediate award of benefits, was appropriate.

KEY QUOTATIONS

“This explanation is problematic because it wholly fails to address any of the issues identified by the previous magistrate judge, instead simply eliminating discussion of these issues.” (PageID #: 3336-37)

“Thus, the ALJ failed to build an accurate and logical bridge supporting why she found Plaintiff’s testimony regarding the severity of his gout symptoms less than credible.” (PageID #: 3337)

“Based on the foregoing, the Court REVERSES the Commissioner of Social Security’s nondisability finding and REMANDS this case to the Commissioner and the ALJ under Sentence Four of § 405(g).” (Conclusion)

FACTUAL BACKGROUND

Gaubatz alleged disability based in part on recurrent gout flare-ups causing pain, swelling, difficulty ambulating, and the need for a cane or crutches during severe episodes. The record included occasional emergency treatment, elevated uric acid, foot swelling and erythema, prescriptions for gout medications, and evidence that he sometimes declined preventive medication while also having alcohol-use disorder. The ALJ relied on objective

findings, daily activities, treatment history, and purported improvement in mental-health symptoms to find that Gaubatz was not disabled during the relevant periods.

PROCEDURAL HISTORY

Gaubatz filed applications for DIB and SSI in 2016. After an initial partially favorable ALJ decision, prior federal-court remands in 2020 and 2023 required further proceedings concerning medical opinions and the evaluation of gout-related subjective symptoms. Following a third ALJ decision finding Gaubatz not disabled during the relevant periods, the Appeals Council declined jurisdiction. In this action, the court held that the ALJ again failed to adequately explain the rejection of Gaubatz's testimony regarding the severity and frequency of gout flare-ups and remanded for further proceedings.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Commissioner and ALJ must reconsider Gaubatz's subjective symptom allegations and provide specific reasons, supported by the record, explaining the evaluation of the severity and frequency of his gout flare-ups. The ALJ must address possible reasons for treatment noncompliance, including the interplay between alcohol-use disorder and gout, and must explain how the evidence and daily activities support the RFC finding.

CASES CITED

- Winn v. Commissioner of Social Security, 615 F. App'x 315, 320 (6th Cir. 2015)
- Rogers v. Commissioner of Social Security, 486 F.3d 234, 241, 248-49 (6th Cir. 2007)
- Cutlip v. Secretary of HHS, 25 F.3d 284, 286 (6th Cir. 1994)
- Olive v. Commissioner of Social Security, No. 3:06 CV 1597, 2007 WL 5403416, at *2 (N.D. Ohio Sept. 19, 2007)
- Abbott v. Sullivan, 905 F.2d 918, 922 (6th Cir. 1990)
- Mullen v. Bowen, 800 F.2d 535, 538 (6th Cir. 1986) (en banc)
- Kinsella v. Schweiker, 708 F.2d 1058, 1059-60 (6th Cir. 1983)
- Combs v. Commissioner of Social Security, 459 F.3d 640, 642-43 (6th Cir. 2006)
- Walters v. Commissioner of Social Security, 127 F.3d 525, 529 (6th Cir. 1997)
- Fleischer v. Astrue, 774 F. Supp. 2d 875, 877, 881 (N.D. Ohio 2011)
- Siterlet v. Secretary of HHS, 823 F.2d 918, 920 (6th Cir. 1987)
- Cross v. Commissioner of Social Security, 373 F. Supp. 2d 724, 733 (N.D. Ohio 2005)
- Felisky v. Bowen, 35 F.3d 1027, 1036 (6th Cir. 1994)
- Carr v. Commissioner of Social Security, No. 3:18-cv-1639, 2019 WL 2465273, at *10 (N.D. Ohio Apr. 24, 2019), report and recommendation adopted, 2019 WL 3752687 (N.D. Ohio Aug. 8, 2019)

- *Mabry-Schlicher v. Commissioner of Social Security*, No. 24-3811, 2025 WL 1604376, at *4 (6th Cir. June 6, 2025)
- *Faucher v. Secretary of Health & Human Services*, 17 F.3d 171, 176 (6th Cir. 1994)
- *Mowery v. Heckler*, 771 F.2d 996, 973 (6th Cir. 1985)
- *Wiser v. Commissioner of Social Security*, 627 F. App'x 523, 526 (6th Cir. 2015)

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