

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Vasquez v. Commissioner of Social Security

Vasquez v. Commissioner of Social Security · No. 1:24-cv-00595-JLT-BAM · Decided July 10, 2025

SUMMARY

Findings and Recommendations from the United States District Court for the Eastern District of California concerning Lourdes Vasquez’s appeal of the denial of disability insurance benefits and supplemental security income. The magistrate judge concluded that the ALJ’s decision was supported by substantial evidence, that the ALJ had no duty to further develop the record, and that the ALJ provided adequate reasons for discounting Plaintiff’s subjective complaints. The document recommends denying Plaintiff’s motion for summary judgment, granting the Commissioner’s request to affirm, and entering judgment for the Commissioner.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Barbara A. McAuliffe
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	July 10, 2025
DOCKET	1:24-cv-00595-JLT-BAM
DISPOSITION	other
PROCEDURAL POSTURE	Plaintiff sought judicial review of the Commissioner's final administrative decision denying disability insurance benefits and supplemental security income. The parties filed cross-motions or briefing addressing summary judgment, and the magistrate judge issued findings and recommendations recommending denial of Plaintiff's motion and affirmance of the agency decision.
STANDARD OF REVIEW	The court reviewed the Commissioner's factual findings for substantial evidence and reviewed whether the Commissioner applied proper legal standards. Substantial evidence is more than a mere scintilla but less than a preponderance and is evidence that a reasonable mind might accept as adequate to support a conclusion.
PRECEDENTIAL VALUE	nonprecedential

PARTIES

Lourdes Vasquez v. Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

summary judgment

disability definition

civil procedure

PRACTICE AREAS

Social Security disability

administrative law

civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ failed to discharge the duty to develop the administrative record by failing to obtain an updated medical opinion or consultative examination.
2. Whether the ALJ improperly formulated the residual functional capacity by relying on his own interpretation of the medical evidence and by limiting standing and walking to four hours.
3. Whether the ALJ provided legally sufficient reasons supported by substantial evidence for discounting Plaintiff's subjective symptom testimony.
4. Whether the Commissioner's denial of benefits was supported by substantial evidence and based on proper legal standards.

HOLDINGS

1. The ALJ was not required to obtain an updated medical opinion or consultative examination because the record was neither inadequate nor ambiguous.
2. The ALJ did not improperly substitute his own medical judgment for that of a medical source in formulating Plaintiff's residual functional capacity.
3. The ALJ provided specific, clear, and convincing reasons supported by substantial evidence for discounting Plaintiff's subjective symptom testimony.

KEY QUOTATIONS

"an ALJ's duty to develop the record further is triggered only when there is ambiguous evidence or when the record is inadequate to allow for proper evaluation of the evidence." (at 4)

"The RFC need not mirror a particular opinion; it is an assessment formulated by the ALJ based on all relevant evidence." (at 7)

"If the claimant satisfies the first step and there is no evidence of malingering, the ALJ may reject the claimant's testimony regarding the severity of his symptoms only by offering specific, clear and convincing reasons for doing so." (at 8)

FACTUAL BACKGROUND

Vasquez alleged disability from chronic right-ankle pain and vertigo. The ALJ found severe impairments consisting of peroneal tendinitis and complex regional pain syndrome of the right leg, but determined that Vasquez retained the residual functional capacity for light work with hazard, temperature, and standing/walking restrictions. The medical record included treatment records, Plaintiff's testimony, a third-party function report, state-agency medical findings, and additional medical opinions that the ALJ found unpersuasive. The ALJ concluded that Vasquez could perform her past work as an electronics assembler and other jobs existing in the national economy.

PROCEDURAL HISTORY

Vasquez applied for disability insurance benefits and supplemental security income, alleging disability beginning December 15, 2020. The applications were denied initially and on reconsideration. After an administrative hearing, ALJ Young Bechtold denied benefits on September 8, 2023, and the Appeals Council denied review, making the ALJ's decision the Commissioner's final decision. The matter was referred to Magistrate Judge Barbara A. McAuliffe, who recommended denial of Plaintiff's motion for summary judgment and entry of judgment for the Commissioner, subject to objections and review by the assigned district judge.

DISPOSITION

other

REMAND INSTRUCTIONS

No remand was recommended. The magistrate judge recommended denial of Plaintiff's motion for summary judgment, granting the Commissioner's request to affirm the agency decision, and entry of judgment for the Commissioner. The parties were permitted fourteen days to file objections under 28 U.S.C. § 636(b)(1).

CASES CITED

- Richardson v. Perales, 402 U.S. 389, 401-02 (1971)
- Sorenson v. Weinberger, 514 F.2d 1112, 1119 n.10 (9th Cir. 1975)
- Jones v. Heckler, 760 F.2d 993, 995 (9th Cir. 1985)
- Burkhart v. Bowen, 856 F.2d 1335, 1338 (9th Cir. 1988)
- Sanchez v. Secretary of Health and Human Services, 812 F.2d 509, 510 (9th Cir. 1987)
- Quang Van Han v. Bowen, 882 F.2d 1453, 1456 (9th Cir. 1989)
- Terry v. Sullivan, 903 F.2d 1273, 1275 (9th Cir. 1990)
- Wagner v. Commissioner of Social Security, No. 1:22-cv-01566-CDB, 2024 WL 1312214, at *9-10 (E.D. Cal. Mar. 27, 2024)
- Bayliss v. Barnhart, 427 F.3d 1211, 1217 (9th Cir. 2005)
- Mayes v. Massanari, 276 F.3d 453, 459-60 (9th Cir. 2001)
- Cindy T. v. Kijakazi, No. 21-cv-00005, 2022 WL 16633010, at *3 (S.D. Cal. Sept. 23, 2022)
- LeBeouf v. Saul, No. 1:19-cv-00201-BAM, 2020 WL 5702240, at *10-11 (E.D. Cal. Sept. 24, 2020)
- Tonapetyan v. Halter, 242 F.3d 1144, 1150 (9th Cir. 2001)

- Tidwell v. Apfel, 161 F.3d 599, 602 (9th Cir. 1998)
- Ashlock v. Kijakazi, No. 1:21-cv-01687-GSA, 2022 WL 2307594, at *3 (E.D. Cal. June 27, 2022)
- Gonzalez v. Kijakazi, No. 1:21-cv-01676-SKO, 2023 WL 6164086, at *6-7 (E.D. Cal. Sept. 21, 2023)
- Mills v. Commissioner of Social Security, No. 2:13-CV-0899-KJN, 2014 WL 4195012, at *4 n.8 (E.D. Cal. Aug. 22, 2014)
- Macias v. O'Malley, No. 1:22-cv-01283-JLT-SKO, 2024 WL 51352, at *7 (E.D. Cal. Jan. 4, 2024)
- Garrison v. Colvin, 759 F.3d 995, 1014-15 (9th Cir. 2014)
- Batson v. Commissioner of Social Security Administration, 359 F.3d 1190, 1196 (9th Cir. 2004)
- Woods v. Commissioner of Social Security, No. 1:20-cv-01110-SAB, 2022 WL 1524772, at *10 n.4 (E.D. Cal. May 13, 2022)
- Carmickle v. Commissioner, 533 F.3d 1155, 1161-63 (9th Cir. 2008)
- Smartt v. Kijakazi, 53 F.4th 489, 498 (9th Cir. 2022)
- Dittmer v. Commissioner of Social Security, No. 1:22-CV-01378-SAB, 2024 WL 967439, at *9 (E.D. Cal. Mar. 6, 2024)
- Molina v. Astrue, 674 F.3d 1104, 1112-15 (9th Cir. 2012)
- Wellington v. Berryhill, 878 F.3d 867, 876 (9th Cir. 2017)
- Williams v. Commissioner of Social Security, No. 1:21-cv-01000-SAB, 2022 WL 3030270, at *4 (E.D. Cal. Aug. 1, 2022)
- Torres v. Commissioner of Social Security, No. 1:19-cv-00067-SAB, 2020 WL 91996, at *5 (E.D. Cal. Jan. 8, 2020)
- Wilkerson v. Wheeler, 772 F.3d 834, 838-39 (9th Cir. 2014)
- Baxter v. Sullivan, 923 F.2d 1391, 1394 (9th Cir. 1991)