

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF NEW YORK

Robert F. v. Commissioner of Social Security

Robert F. · No. 1:24-CV-00750 EAW · Decided January 29, 2026

SUMMARY

The United States District Court for the Western District of New York reviewed the denial of Robert F.’s application for disability insurance benefits. The court held that the administrative law judge’s residual functional capacity determination and evaluation of the medical opinions were supported by substantial evidence and free of legal error. The court granted the Commissioner’s motion for judgment on the pleadings, denied Plaintiff’s motion, and directed entry of judgment for the Commissioner.

CASE DETAILS

COURT	United States District Court for the Western District of New York
WRITING FOR THE COURT	Elizabeth A. Wolford
JURISDICTION	United States District Court for the Western District of New York
DECIDED	January 29, 2026
DOCKET	1:24-CV-00750 EAW
DISPOSITION	affirmed
PROCEDURAL POSTURE	Social Security claimant sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying disability insurance benefits. The parties filed cross-motions for judgment on the pleadings under Federal Rule of Civil Procedure 12(c).
STANDARD OF REVIEW	The court reviews the Commissioner's final decision to determine whether it is supported by substantial evidence and based on the correct legal standard. The court does not decide de novo whether the claimant is disabled, and the deferential substantial-evidence standard does not apply to the Commissioner's conclusions of law.
PRECEDENTIAL VALUE	unpublished
PARTIES	Robert F. v. Commissioner of Social Security

TOPICS

judicial review of agency action

agency adjudication

administrative law

ada / disability

PRACTICE AREAS

Social Security disability

administrative law

federal judicial review

QUESTIONS PRESENTED

1. Whether the ALJ's residual functional capacity limitation requiring a break after two to three hours of continuous standing or walking was sufficiently explained and supported by substantial evidence.
2. Whether the ALJ improperly failed to include mental limitations in the residual functional capacity or failed to adequately evaluate the consistency between the opinions of Dr. Susan Santarpia and Dr. Vikas Singla.
3. Whether the Commissioner's final determination denying disability insurance benefits was supported by substantial evidence and free from legal error.

HOLDINGS

1. The ALJ adequately explained and supported the limitation requiring a break of up to fifteen minutes after two to three hours of continuous standing or walking; the limitation was not impermissibly vague and did not conflict with the vocational expert's testimony regarding permissible off-task time.
2. The ALJ properly evaluated Dr. Santarpia's and Dr. Singla's opinions under 20 C.F.R. § 404.1520c and was not required either to compare the opinions individually with one another or to include mental limitations in the RFC based solely on mild limitations.
3. The Commissioner's final determination denying disability insurance benefits was supported by substantial evidence and free from legal error, so remand was unwarranted.

KEY QUOTATIONS

"A 15-minute break from continuous standing or walking does not equate to time off task, as light work only requires an individual to be able to "stand and walk for up to 6 hours a day, [as well as] sit for up to two hours."" (Discussion II.A)

"For the reasons stated above, the Commissioner's motion for judgment on the pleadings (Dkt. 10) is granted, and Plaintiff's motion for judgment on the pleadings (Dkt. 6) is denied." (Conclusion)

FACTUAL BACKGROUND

Robert F. alleged disability based principally on stage 3 colorectal cancer and related back and hip pain. The ALJ found rectosigmoid junction cancer with low back pathology to be a severe impairment, while finding several other physical and mental conditions non-severe. The ALJ determined that Robert F. retained the residual functional capacity for light work with additional standing, walking, environmental, postural, foot-control, and hazard restrictions, and could perform past relevant work as a policy holder information clerk or operating room technician.

PROCEDURAL HISTORY

Robert F. applied for disability insurance benefits in July 2022, alleging disability from stage 3 colorectal cancer beginning April 16, 2022. The Social Security Administration denied the application initially and on reconsideration. After a March 7, 2024 hearing, an administrative law judge issued an unfavorable decision on April 3, 2024, and the Appeals Council denied review on June 13, 2024. The district court granted the Commissioner's motion for judgment on the pleadings, denied the plaintiff's motion, directed entry of judgment, and closed the case.

DISPOSITION

affirmed

CASES CITED

- Talavera v. Astrue, 697 F.3d 145, 151 (2d Cir. 2012)
- Richardson v. Perales, 402 U.S. 389, 401 (1971)
- Schaal v. Apfel, 134 F.3d 496, 501 (2d Cir. 1998)
- Byam v. Barnhart, 336 F.3d 172, 179 (2d Cir. 2003)
- Bowen v. City of New York, 476 U.S. 467, 470-71 (1986)
- Rosa v. Callahan, 168 F.3d 72, 77 (2d Cir. 1999)
- Matta v. Astrue, 508 F. App'x 53, 56 (2d Cir. 2013)
- Schillo v. Kijakazi, 31 F.4th 64, 78 (2d Cir. 2022)
- Cichocki v. Astrue, 729 F.3d 172, 177 (2d Cir. 2013)
- Chelsea L. v. Commissioner of Social Security, No. 1:23-CV-00933-CJS, 2024 WL 4198143, at *15 (W.D.N.Y. Sept. 16, 2024)
- Mancuso v. Astrue, 361 F. App'x 176, 178 (2d Cir. 2010)
- Hamilton v. Commissioner of Social Security, No. 19-CV-770 (JLS), 2020 WL 5544557, at *6 (W.D.N.Y. Sept. 16, 2020)
- Torbicki v. Berryhill, No. 17-CV-386(MAT), 2018 WL 3751290, at *5 (W.D.N.Y. Aug. 8, 2018)
- Linda A. v. Commissioner of Social Security, No. 6:24-CV-6258 (JLS), 2025 WL 3482747, at *4 (W.D.N.Y. Dec. 4, 2025)
- Miles v. Harris, 645 F.2d 122, 124 (2d Cir. 1981)
- Edwin S. o/b/o J.O.S. v. O'Malley, No. 5:23-cv-1244 (GTS/TWD), 2024 WL 5371513, at *8 (N.D.N.Y. Dec. 13, 2024), report and recommendation adopted, No. 5:23-CV-1244 (AJB/TWD), 2025 WL 345813, at *1 (N.D.N.Y. Jan. 30, 2025)
- Venio v. Barnhart, 312 F.3d 578, 588 (2d Cir. 2002)
- Kohler v. Astrue, 546 F.3d 260, 266 (2d Cir. 2008)
- Lynette W. v. Commissioner of Social Security, No. 19-CV-1168-FPG, 2021 WL 868625, at *4 (W.D.N.Y. Mar. 9, 2021)
- Teena H. o/b/o N.I.K. v. Commissioner of Social Security, 521 F. Supp. 3d 287, 292 (W.D.N.Y. 2021)

- Pellam v. Astrue, 508 F. App'x 87, 91 (2d Cir. 2013)

Retrieved from lawtools.ai · <https://lawtools.ai/cases/federal/united-states-district-court-for-the-western-district-of-new/2026/robert-f-v-commissioner-of-social-security-ts630egw>