

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF NEW YORK

Stephanie Morales v. Commissioner of the Social Security Administration

Case No. 24-CV-4755 (FB) (E.D.N.Y. Dec. 4, 2025) · No. 24-CV-4755 (FB) · Decided December 4, 2025

SUMMARY

The United States District Court for the Eastern District of New York denied Stephanie Morales’s motion for judgment on the pleadings and granted the Commissioner of Social Security’s motion. The court upheld the denial of Social Security Disability Insurance benefits, finding that the administrative law judge’s residual functional capacity assessment and evaluation of Morales’s symptoms were supported by substantial evidence and applied the correct legal standards.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                              |
|-----------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Eastern District of New York                                                                                                                                                                                                                                                                                            |
| WRITING FOR THE COURT | Frederic Block                                                                                                                                                                                                                                                                                                                                               |
| JURISDICTION          | United States District Court for the Eastern District of New York                                                                                                                                                                                                                                                                                            |
| DECIDED               | December 4, 2025                                                                                                                                                                                                                                                                                                                                             |
| DOCKET                | 24-CV-4755 (FB)                                                                                                                                                                                                                                                                                                                                              |
| DISPOSITION           | other                                                                                                                                                                                                                                                                                                                                                        |
| PROCEDURAL POSTURE    | Judicial review under 42 U.S.C. § 405(g) of the Commissioner's denial of Social Security Disability Insurance benefits; both parties moved for judgment on the pleadings under Federal Rule of Civil Procedure 12(c).                                                                                                                                        |
| STANDARD OF REVIEW    | The court conducts plenary review of the administrative record to determine whether substantial evidence supports the Commissioner's decision and whether the correct legal standards were applied. The court may not conduct de novo review or substitute its judgment for the ALJ's, and may reverse only for lack of substantial evidence or legal error. |
| PRECEDENTIAL VALUE    | unpublished                                                                                                                                                                                                                                                                                                                                                  |
| PARTIES               | Stephanie Morales v. Commissioner of the Social Security Administration                                                                                                                                                                                                                                                                                      |

## TOPICS

judicial review of agency action

administrative law

disability definition

ada / disability

## PRACTICE AREAS

social security disability

administrative law

judicial review of agency action

disability benefits

## QUESTIONS PRESENTED

1. Whether the ALJ's residual functional capacity assessment was supported by substantial evidence.
2. Whether the ALJ properly evaluated the medical opinions, including the treating psychiatrist's opinion, under the post-2017 regulations.
3. Whether the ALJ properly evaluated Morales's subjective allegations concerning hearing loss, concentration, social interaction, and other disabling symptoms.
4. Whether the Commissioner's finding that Morales was not disabled was supported by substantial evidence and free of legal error.

## HOLDINGS

1. The ALJ's RFC assessment was supported by substantial evidence even though it did not use the exact wording of the medical expert's testimony. An RFC conclusion need not perfectly match any single medical opinion so long as it is supported by substantial evidence.
2. The ALJ was not required to give special deference or controlling weight to the treating psychiatrist's opinion because the treating-physician rule was abrogated for applications filed after March 27, 2017. The ALJ properly evaluated the opinion under 20 C.F.R. § 404.1520c, focusing principally on supportability and consistency.
3. The ALJ properly evaluated Morales's subjective allegations and identified record-based reasons for the findings concerning her hearing difficulties, social functioning, and ability to perform simple tasks. Those findings were entitled to deference because they were supported by substantial evidence.

## KEY QUOTATIONS

*"The ALJ's RFC conclusion need not perfectly match any single medical opinion in the record, so long as it is supported by substantial evidence."* (Tr. 22–23)

*"a claimant's credibility regarding her impairments should not be discounted for failure to obtain treatment she could not afford"* (Tr. 24)

*"are not supported by substantial evidence or if the decision is based on legal error."* (Tr. 27)

## FACTUAL BACKGROUND

Morales alleged disability beginning January 1, 2020, based principally on bipolar disorder, anxiety, PTSD, paranoia, and bilateral hearing loss. The ALJ found severe impairments consisting of bilateral hearing loss, major depressive disorder, PTSD, and opioid use disorder in remission, but found that the impairments did not

meet or equal a listed impairment. Based on medical and vocational evidence, including testimony from medical and vocational experts, the ALJ found that Morales retained the capacity for a reduced range of light work with restrictions on oral communication, social contact, and task complexity.

## PROCEDURAL HISTORY

Morales applied for Disability Insurance benefits in July 2020. The claim was initially denied, and an ALJ found her not disabled on September 19, 2023. The Appeals Council denied review, after which Morales commenced this action. The district court denied Morales's motion for judgment on the pleadings and granted the Commissioner's motion.

## DISPOSITION

other

## CASES CITED

- Rucker v. Kijakazi, 48 F.4th 86, 90–91 (2d Cir. 2022)
- Cage v. Comm'r of Soc. Sec., 692 F.3d 118, 122 (2d Cir. 2012)
- Burgess v. Astrue, 537 F.3d 117, 127 (2d Cir. 2008)
- Selian v. Astrue, 708 F.3d 409, 417 (2d Cir. 2013)
- McIntyre v. Colvin, 758 F.3d 146, 150 (2d Cir. 2014)
- Schillo v. Kijakazi, 31 F.4th 64, 78 (2d Cir. 2022)
- Rushford v. Kijakazi, No. 23-317, 2023 U.S. App. LEXIS 34401, 2023 WL 8946622, at \*1 (2d Cir. Dec. 28, 2023)
- Veino v. Barnhart, 312 F.3d 578, 588 (2d Cir. 2002)
- Stanton v. Astrue, 370 F. App'x 231, 234 (2d Cir. 2010)
- Bernadel v. Comm'r of Soc. Sec., No. 14-CV-5170 (PKC), 2015 WL 5719725, at \*14 (E.D.N.Y. Sept. 29, 2015)
- Marquez v. Colvin, 2013 WL 5568718, at \*7 (S.D.N.Y. Oct. 9, 2013)
- Jones v. Berryhill, 415 F. Supp. 3d 401, 421 (S.D.N.Y. 2019)