

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF IDAHO

Brooke Rose S. v. Commissioner of Social Security

Brooke Rose S. · No. 1:24-cv-00584-REP · Decided April 23, 2026

SUMMARY

The United States District Court for the District of Idaho reviewed Brooke Rose S.'s challenge under 42 U.S.C. § 405(g) to the denial of Social Security disability insurance benefits and supplemental security income. The court held that the Administrative Law Judge adequately evaluated Dr. Hicks's medical opinion under the supportability and consistency factors and that the residual functional capacity determination was supported by substantial evidence, including the omission of a specific neck-flexion limitation.

CASE DETAILS

COURT	United States District Court for the District of Idaho
WRITING FOR THE COURT	Raymond E. Patricco
JURISDICTION	United States District Court for the District of Idaho
DECIDED	April 23, 2026
DOCKET	1:24-cv-00584-REP
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying her applications for disability insurance benefits and supplemental security income.
STANDARD OF REVIEW	The Commissioner's decision is upheld if supported by substantial evidence and based on proper legal standards. The court reviews the record as a whole, may not substitute its judgment for the ALJ's where the evidence permits more than one rational interpretation, and reverses for legal error.
PRECEDENTIAL VALUE	unpublished
PARTIES	Brooke Rose S. v. Commissioner of Social Security

TOPICS

- judicial review of agency action
- administrative law
- agency adjudication
- exhaustion of remedies

PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ properly evaluated the supportability and consistency of Dr. Laurence Hicks's medical opinion under 20 C.F.R. § 404.1520c.
2. Whether the ALJ's residual functional capacity determination was supported by substantial evidence despite omitting a specific neck-flexion limitation.
3. Whether the ALJ improperly relied on lay interpretation of Plaintiff's MRI results.

HOLDINGS

1. The ALJ properly evaluated Dr. Hicks's opinion by addressing both supportability and consistency, and substantial evidence supported the finding that the opinion was unpersuasive.
2. The ALJ's residual functional capacity determination was supported by substantial evidence, and the ALJ was not required to include a specific neck-flexion limitation that no medical professional had proposed and supported.
3. The ALJ did not improperly interpret raw MRI data; any alleged error was harmless because the RFC determination was independently supported by substantial evidence.

KEY QUOTATIONS

“The ALJ validly considered Dr. Hicks’s own treatment notes in her supportability analysis, because those notes formed the basis of Dr. Hicks’s opinion.” (AR 26)

“The ALJ chose to account for Plaintiff’s neck impairments with other limitations in her RFC that were better rooted in the relevant evidence.” (AR 22, 24-27)

“IT IS HEREBY ORDERED that the decision of the Commissioner is AFFIRMED, that Plaintiff’s Complaint for Review of a Social Security (Dkt. 1) is DENIED, and this action is DISMISSED in its entirety, with prejudice.” (Conclusion)

FACTUAL BACKGROUND

Plaintiff alleged disability based on multiple impairments, including cervical degenerative disc disease, chronic pain syndrome, temporomandibular joint disorder, endometriosis and related conditions, and a right knee condition. The ALJ found that Plaintiff had not engaged in substantial gainful activity, had severe impairments, did not meet a listed impairment, and retained a restricted sedentary residual functional capacity. The ALJ found that Plaintiff could not perform past relevant work but could perform other jobs existing in significant numbers in the national economy.

PROCEDURAL HISTORY

Plaintiff filed Title II and Title XVI applications alleging disability beginning January 1, 2017. The claims were denied initially and on reconsideration; following a March 14, 2024 hearing, the ALJ denied benefits on April

23, 2024. The Appeals Council denied review on October 8, 2024, making the ALJ's decision final. Plaintiff then filed this action, and the district court affirmed the Commissioner's decision and dismissed the complaint with prejudice.

DISPOSITION

affirmed

CASES CITED

- Trevizo v. Berryhill, 871 F.3d 664 (9th Cir. 2017)
- Treichler v. Comm'r of Social Sec. Admin., 775 F.3d 1090, 1098 (9th Cir. 2014)
- Richardson v. Perales, 402 U.S. 389, 401 (1971)
- Ludwig v. Astrue, 681 F.3d 1047, 1051 (9th Cir. 2012)
- Pierce v. Underwood, 487 U.S. 552, 565 (1988)
- Batson v. Comm'r of Social Sec., 359 F.3d 1190, 1196 (9th Cir. 2004)
- Zavalin v. Colvin, 778 F.3d 842, 845 (9th Cir. 2015)
- Vernoff v. Astrue, 568 F.3d 1102, 1105 (9th Cir. 2009)
- Smith v. Heckler, 820 F.2d 1093, 1094 (9th Cir. 1987)
- Woods v. Kijakazi, 32 F.4th 785, 787, 792 (9th Cir. 2022)
- Kitchen v. Kijakazi, 82 F.4th 732, 740 (9th Cir. 2023)
- Tommasetti v. Astrue, 533 F.3d 1035, 1041 (9th Cir. 2008)
- Garrison v. Colvin, 759 F.3d 995, 1011 (9th Cir. 2014)
- Moriarty v. Colvin, Case No. CV 14-6909 RNB, 2015 WL 4397913, at *1 (C.D. Cal. July 17, 2015)
- Rounds v. Comm'r SSA, 807 F.3d 996, 1006 (9th Cir. 2015)
- Vertigan v. Halter, 260 F.3d 1044, 1049 (9th Cir. 2001)
- Thomas v. Barnhart, 278 F.3d 947, 958 (9th Cir. 2002)
- Farlow v. Kijakazi, 53 F.4th 485, 488 (9th Cir. 2022)
- Sample v. Schweiker, 694 F.2d 639, 642 (9th Cir. 1982)
- Mendoza v. Kijakazi, Case No. 1:19-cv-1371-HBK, 2022 WL 715096, at *4 (E.D. Cal. Mar. 10, 2022)
- Bayliss v. Barnhart, 427 F.3d 1211, 1217 (9th Cir. 2005)
- Turner v. Comm'r Soc. Sec., 613 F.3d 1217, 1222-23 (9th Cir. 2010)
- Smolen v. Chater, 80 F.3d 1273, 1291 (9th Cir. 1996)