

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ARIZONA

**Amanda Lee Lawson v. Commissioner of Social Security
Administration**

No. CV-24-03149-PHX-KML (D. Ariz. Mar. 6, 2026) · No. No. CV-24-03149-PHX-KML · Decided March 9,
2026

SUMMARY

The District of Arizona adopted in part and rejected in part a magistrate judge’s recommendation concerning Amanda Lee Lawson’s challenge to the denial of Social Security Disability Insurance benefits. The court found that the ALJ erred in evaluating the treating neurologist’s opinion and Lawson’s symptom testimony, but concluded that conflicts in the medical evidence required further administrative proceedings rather than a direct award of benefits. The court vacated the ALJ’s decision, remanded for further proceedings, and directed the Clerk to enter judgment and close the case.

CASE DETAILS

COURT	United States District Court for the District of Arizona
WRITING FOR THE COURT	Krissa M. Lanham
JURISDICTION	United States District Court for the District of Arizona
DECIDED	March 9, 2026
DOCKET	No. CV-24-03149-PHX-KML
DISPOSITION	remanded
PROCEDURAL POSTURE	Judicial review of an administrative law judge's denial of Social Security Disability Insurance benefits following a magistrate judge's Report and Recommendation.
STANDARD OF REVIEW	De novo review of the magistrate judge's Report and Recommendation; judicial review of the ALJ's decision for harmful legal error and application of the Ninth Circuit's credit-as-true framework to determine the scope of remand.
PRECEDENTIAL VALUE	unpublished and nonprecedential district court order
PARTIES	Amanda Lee Lawson v. Commissioner of Social Security Administration

TOPICS

judicial review of agency action

administrative law

remedies

equitable relief

PRACTICE AREAS

social security

administrative law

civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ committed harmful legal error by discounting the treating neurologist's opinion without evaluating the supportability and consistency factors.
2. Whether the ALJ improperly discounted Lawson's symptom testimony without providing specific, clear, and convincing reasons supported by substantial evidence.
3. Whether the record satisfied the Ninth Circuit's credit-as-true standard so that the case should be remanded for calculation and award of benefits rather than further administrative proceedings.

HOLDINGS

1. The ALJ committed harmful legal error by discounting Dr. Saperstein's opinion without evaluating whether it was consistent with other sources and by relying on factual descriptions contradicted by the medical record.
2. The ALJ committed harmful legal error by discounting Lawson's symptom testimony without providing specific, clear, and convincing reasons supported by substantial evidence.
3. Further administrative proceedings, rather than an immediate calculation and award of benefits, were required because the administrative record contained material conflicts concerning Lawson's work-related limitations.

KEY QUOTATIONS

“When this three-part analysis is satisfied, a remand for calculation of benefits is permissible. But even if permissible, “it is within the court’s discretion either to make a direct award of benefits or to remand for further proceedings.”” (at 2)

“Nonetheless, a court should not remand for benefits unless, under step two of the credit-as-true analysis, the record is “free of conflicts.”” (at 3)

“It may be that the consultants’ assessments are less persuasive than Dr. Saperstein’s because, unlike Dr. Saperstein, they never examined Lawson in person. But on this record, resolving the conflict is a task for the ALJ.” (at 4)

FACTUAL BACKGROUND

The ALJ denied Lawson's claim for Social Security Disability Insurance benefits after evaluating the opinion of her treating neurologist, Dr. David Saperstein, and Lawson's symptom testimony. The ALJ discounted Dr. Saperstein's opinion based on an inaccurate characterization that it relied only on telemedicine visits and post-dated the last-insured date, even though the records reflected multiple in-person visits during the relevant period.

The administrative record also contained conflicting assessments from state-agency medical consultants concerning Lawson's work-related limitations.

PROCEDURAL HISTORY

An ALJ denied Lawson's application for Social Security Disability Insurance benefits. The parties agreed that the ALJ committed legal error, but disputed the appropriate scope of remand. A magistrate judge recommended remand for calculation and award of benefits. After de novo review, the district court adopted the recommendation in part, rejected it in part, vacated the ALJ's decision, and remanded for further administrative proceedings.

DISPOSITION

remanded

REMAND INSTRUCTIONS

The ALJ must conduct further administrative proceedings, including resolving the material conflict between Dr. Saperstein's assessment and the state-agency medical consultants' assessments, and reconsider Lawson's disability determination. The district court vacated the April 9, 2024 ALJ decision and directed the Clerk to enter final judgment and close the case.

CASES CITED

- Woods v. Kijakazi, 32 F.4th 785, 792 (9th Cir. 2022)
- Revels v. Berryhill, 874 F.3d 648, 655 (9th Cir. 2017)
- Leon v. Berryhill, 880 F.3d 1041, 1045–47 (9th Cir. 2017)
- Hendrix v. Comm'r, No. CV-23-01113-PHX-DLR, 2025 WL 829786, at *2–3 (D. Ariz. Mar. 17, 2025)
- Reddick v. Chater, 157 F.3d 715, 723 (9th Cir. 1998)