

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
CALIFORNIA

Raymond Daniel Green v. Commissioner of Social Security

Green · No. 2:24-CV-1381-DAD-DMC · Decided August 5, 2025

SUMMARY

The document contains findings and recommendations in Raymond Daniel Green’s action for judicial review of a Social Security disability benefits decision under 42 U.S.C. § 405(g). The court addresses the ALJ’s treatment of Plaintiff’s mild mental impairments and subjective symptom testimony, concluding that the ALJ adequately considered the mental limitations but failed to sufficiently link the evidence to specific portions of Plaintiff’s statements and testimony. The court recommends remand for further proceedings.

CASE DETAILS

COURT	United States District Court for the Eastern District of California
WRITING FOR THE COURT	Dennis M. Cota
JURISDICTION	United States District Court for the Eastern District of California
DECIDED	August 5, 2025
DOCKET	2:24-CV-1381-DAD-DMC
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's denial of Social Security benefits. The parties filed cross-motions for summary judgment, and the magistrate judge issued findings and recommendations recommending that Plaintiff's motion be granted, Defendant's motion be denied, and the Commissioner's decision be reversed and remanded.
STANDARD OF REVIEW	The court reviews the Commissioner's final decision to determine whether it applied proper legal standards and whether the decision is supported by substantial evidence in the record as a whole. A decision supported by substantial evidence must be affirmed when the evidence is susceptible to more than one rational interpretation, provided the proper legal standards were applied.
PRECEDENTIAL VALUE	nonprecedential

TOPICS

judicial review of agency action

administrative law

agency adjudication

ada / disability

PRACTICE AREAS

Social Security disability

administrative law

federal judicial review

QUESTIONS PRESENTED

1. Whether the ALJ properly considered Green's mild mental impairments when formulating the residual functional capacity at Steps 4 and 5.
2. Whether the ALJ provided legally sufficient, specific, clear, and convincing reasons for discounting Green's subjective statements and testimony concerning pain and physical limitations.
3. Whether the ALJ adequately explained how Green's daily activities undermined his allegations or demonstrated an ability to sustain full-time competitive work.

HOLDINGS

1. The ALJ did not err in considering Green's mild mental impairments at Step 4. The decision discussed Green's mental-health diagnoses, treatment, symptoms, mental-status examinations, medical-opinion evidence, and activities, and the incorporation of the Step 2 severity analysis was adequate when coupled with the additional Step 4 discussion.
2. The ALJ failed to provide legally sufficient reasons for discounting Green's subjective statements because the ALJ did not identify which specific portions of Green's testimony were undermined by which specific portions of the record.
3. The ALJ erred by relying on Green's daily activities without addressing their limited nature, the assistance he required, or explaining how those activities translated to the ability to sustain full-time competitive work.

KEY QUOTATIONS

“The Court can only guess as to what rationale the ALJ employed and cannot substitute its own rationale, or that of the Commissioner, for analysis by the ALJ in the first instance.” (at 11)

“The ALJ did not, however, comment on the limited ability of Plaintiff to engage in these tasks or that he needed assistance for many of the tasks listed.” (at 13-14)

FACTUAL BACKGROUND

Green alleged disability based principally on persistent back pain following fusion surgery, knee pain, and mental-health symptoms including depression and anxiety. The ALJ found degenerative disc disease of the lumbar spine with obesity to be a severe impairment, found Green's mental impairments nonsevere, and assessed

a reduced range of light work. In discounting Green's subjective statements, the ALJ relied on objective medical evidence and activities such as household chores, church attendance, shopping, driving, and socializing, but did not address Green's testimony about the limited manner in which he performed those activities or explain their relationship to full-time work.

PROCEDURAL HISTORY

Green applied for Social Security benefits on June 25, 2021, alleging disability beginning April 21, 2004. After the claim was denied initially and on reconsideration, an administrative hearing was held before ALJ Gregory Moldafsky, who issued a May 30, 2023 decision finding Green not disabled. The Appeals Council denied review on August 3, 2023. Green then filed this action, and the magistrate judge recommended remand because the ALJ failed to connect specific evidence to specific portions of Green's symptom testimony and failed to explain how his limited daily activities translated to an ability to sustain full-time competitive work.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remand for a new hearing and administrative decision. The Commissioner should properly evaluate Green's subjective statements and testimony, identify the specific testimony being discounted, connect it to specific contrary evidence, and explain whether and how Green's daily activities demonstrate an ability to sustain full-time competitive work.

CASES CITED

- Tackett v. Apfel, 180 F.3d 1094, 1097 (9th Cir. 1999)
- Saelee v. Chater, 94 F.3d 520, 521-22 (9th Cir. 1996)
- Richardson v. Perales, 402 U.S. 389, 402 (1971)
- Howard v. Heckler, 782 F.2d 1484, 1487-88 (9th Cir. 1986)
- Jones v. Heckler, 760 F.2d 993, 995 (9th Cir. 1985)
- Hammock v. Bowen, 879 F.2d 498, 501 (9th Cir. 1989)
- Sprague v. Bowen, 812 F.2d 1226, 1229-30 (9th Cir. 1987)
- Thomas v. Barnhart, 278 F.3d 947, 954, 958-59 (9th Cir. 2002)
- Burkhart v. Bowen, 856 F.2d 1335, 1338, 1340 (9th Cir. 1988)
- Quang Van Han v. Bower, 882 F.2d 1453, 1456 (9th Cir. 1989)
- Terry v. Sullivan, 903 F.2d 1273, 1275 (9th Cir. 1990)
- Gallant v. Heckler, 753 F.2d 1450, 1452-53 (9th Cir. 1984)
- Hoffman v. Heckler, 785 F.2d 1423, 1425 (9th Cir. 1986)
- Hammock v. Bowen, 867 F.2d 1209, 1212-13 (9th Cir. 1989)
- Valencia v. Heckler, 751 F.2d 1082, 1085 (9th Cir. 1985)

- Hutton v. Astrue, 491 Fed. Appx. 850 (9th Cir. 2012) (unpublished)
- Woods v. Kijakazi, 32 F.4th 785 (9th Cir. 2022)
- Diane v. Kijakazi, 2023 WL 7301969
- Fortunato v. O'Malley, 2024 WL 1179966, *4 n.2 (E.D. Cal. 2024)
- Rashad v. Sullivan, 903 F.2d 1229, 1231 (9th Cir. 1990)
- Carmickle v. Commissioner, 533 F.3d 1155, 1160-61 (9th Cir. 2008)
- Lingenfelter v. Astrue, 504 F.3d 1028, 1036 (9th Cir. 2007)
- Gregor v. Barnhart, 464 F.3d 968, 972 (9th Cir. 2006)
- Cotton v. Bowen, 799 F.2d 1403 (9th Cir. 1986)
- Fair v. Bowen, 885 F.2d 597, 602-03 (9th Cir. 1989)
- Orn v. Astrue, 495 F.3d 625, 639 (9th Cir. 2007)
- Vertigan v. Heller, 260 F.3d 1044, 1050 (9th Cir. 2001)
- Burch v. Barnhart, 400 F.3d 676, 681 (9th Cir. 2005)
- Martinez v. Ylst, 951 F.2d 1153 (9th Cir. 1991)