

UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF
ILLINOIS

Michael W. v. Commissioner of Social Security

Michael W. · No. 24-cv-2497-RJD · Decided March 27, 2026

SUMMARY

The court affirmed the Commissioner of Social Security’s denial of Michael W.’s application for Disability Insurance Benefits. It held that substantial evidence supported the ALJ’s determination that Plaintiff’s substance use was material to the disability finding and rejected arguments that the ALJ substituted lay judgment for medical expertise or failed to resolve vocational evidence conflicts.

CASE DETAILS

COURT	United States District Court for the Southern District of Illinois
WRITING FOR THE COURT	Reona J. Daly
JURISDICTION	United States District Court for the Southern District of Illinois
DECIDED	March 27, 2026
DOCKET	24-cv-2497-RJD
DISPOSITION	affirmed
PROCEDURAL POSTURE	Judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying an application for Disability Insurance Benefits.
STANDARD OF REVIEW	The court reviews whether the ALJ's decision is supported by substantial evidence and free of legal error. It considers the entire administrative record but does not reweigh evidence, resolve evidentiary conflicts, decide credibility questions, or substitute its judgment for the ALJ's; the ALJ must provide a logical bridge between the evidence and the conclusions.
PRECEDENTIAL VALUE	unpublished
PARTIES	Michael W. v. Commissioner of Social Security

TOPICS

- judicial review of agency action
- administrative law
- disability definition

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the ALJ substituted his own lay medical opinion for medical expertise in finding that Plaintiff's substance use was material to the disability determination.
2. Whether the ALJ's decision was supported by substantial evidence.
3. Whether the ALJ failed to resolve an apparent conflict between the vocational expert's testimony and the Dictionary of Occupational Titles.

HOLDINGS

1. The ALJ did not improperly play doctor or substitute lay opinion for medical expertise because the record contained no unaddressed medical opinion or raw medical data requiring expert interpretation, and the ALJ relied on the available treatment records and the absence of evidence showing disabling psychiatric limitations during sobriety.
2. The ALJ properly found that Plaintiff's drug addiction was a contributing factor material to the determination of disability because the evidence did not establish disabling limitations that would remain if Plaintiff stopped using drugs.
3. The ALJ's decision was supported by substantial evidence and contained the required logical bridge between the evidence and the conclusion that Plaintiff was not entitled to benefits.
4. The vocational-expert argument did not warrant remand because the ALJ found that Plaintiff could perform the identified jobs only if he stopped substance abuse, and the vocational expert testified that the corresponding limitations on attendance and off-task time would preclude competitive employment.

KEY QUOTATIONS

“There must be a “logical bridge” between the ALJ’s conclusion and the evidence.” (page 3)

“After careful review of the record as a whole, the Commissioner’s final decision denying Plaintiff’s application for a period of disability and disability insurance benefits is AFFIRMED.” (page 9)

FACTUAL BACKGROUND

Plaintiff alleged disability based principally on major depressive disorder and polysubstance abuse. The record showed a fentanyl overdose in May 2020, a subsequent hospitalization for suicidal thoughts and substance-related psychiatric symptoms, and diagnoses including major depressive disorder, opioid use disorder, and substance-induced mood disorder. The state-agency medical and psychological consultants could not provide opinions because of insufficient evidence and Plaintiff's failure to return forms or respond to calls. The ALJ found that Plaintiff would be unable to work while using substances, but that he could perform jobs existing in significant numbers in the national economy if he stopped substance abuse.

PROCEDURAL HISTORY

Plaintiff applied for Disability Insurance Benefits in May 2022, alleging disability beginning October 1, 2020. After an evidentiary hearing on March 28, 2024, the ALJ denied the application, and the Appeals Council denied review. Plaintiff then filed a timely complaint in the Southern District of Illinois; the parties consented to final disposition by the magistrate judge.

DISPOSITION

affirmed

CASES CITED

- O'Kane v. Apfel, 224 F.3d 686, 688
- Kangail v. Barnhart, 454 F.3d 627, 629
- Tutweiler v. Kijakazi, 87 F.4th 853, 857
- Warnell v. O'Malley, 97 F.4th 1050, 1052
- Minnick v. Colvin, 775 F.3d 929, 935
- Hess v. O'Malley, 92 F.4th 671, 676-77
- Jeske v. Saul, 955 F.3d 583, 587
- Eichstadt v. Astrue, 534 F.3d 663, 668
- McHenry v. Berryhill, 911 F.3d 866, 871
- Rohan v. Chater, 98 F.3d 966, 971

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