

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
MICHIGAN, SOUTHERN DIVISION

Kelli S. v. Commissioner of Social Security

Civil Action No. 25-10724 · No. 25-10724 · Decided March 2, 2026

SUMMARY

The United States District Court for the Eastern District of Michigan reviewed the Commissioner of Social Security’s denial of Kelli S.’s applications for Disability Insurance Benefits and Supplemental Security Income. The court held that the Administrative Law Judge inadequately explained the supportability and consistency analysis applied to a consultative psychologist’s medical opinion. It denied the Commissioner’s motion, granted the plaintiff’s motion, and remanded the case for further proceedings under sentence four of 42 U.S.C. § 405(g).

CASE DETAILS

COURT	United States District Court for the Eastern District of Michigan, Southern Division
WRITING FOR THE COURT	David R. Grand
JURISDICTION	United States District Court for the Eastern District of Michigan, Southern Division
DECIDED	March 2, 2026
DOCKET	25-10724
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying Disability Insurance Benefits and Supplemental Security Income. The parties filed cross-motions for summary judgment.
STANDARD OF REVIEW	The court reviews the Commissioner's final decision to determine whether the correct legal standard was applied and whether the factual findings are supported by substantial evidence. Substantial evidence means such relevant evidence as a reasonable mind might accept as adequate to support a conclusion, and the court considers the record as a whole.
PRECEDENTIAL VALUE	unpublished district court opinion

TOPICS

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QUESTIONS PRESENTED

1. Whether the ALJ adequately explained the supportability and consistency analysis required by 20 C.F.R. §§ 404.1520c and 416.920c when discounting Dr. Brady's medical opinion.
2. Whether the ALJ's finding that Plaintiff was not disabled was supported by substantial evidence.
3. Whether remand under sentence four of 42 U.S.C. § 405(g) was required.

HOLDINGS

1. The ALJ did not adequately explain the supportability and consistency factors applicable to Dr. Brady's opinion. The ALJ's brief statement that Plaintiff interacted appropriately with treatment providers and examiners addressed, at most, social interaction and did not explain the treatment of Dr. Brady's findings concerning concentration, workplace stress, depression, or other functional limitations.
2. The Commissioner's decision that Plaintiff was not disabled was not supported by substantial evidence because the ALJ failed to provide a sufficient rationale for rejecting a medical opinion addressing a critical aspect of Plaintiff's disability claim.

KEY QUOTATIONS

“The connection between the objective evidence and Dr. Brady’s conclusions is the job of the ALJ, not the Court.” (PageID.45)

“Without expressing a view on whether the ALJ might supportably reach the same conclusion on remand, the explanation provided simply “is too sparse to allow meaningful, judicial review.”” (PageID.46)

“In sum, the Court finds that the ALJ’s decision – on a critical aspect of Plaintiff’s disability claim – failed to sufficiently explain his finding that Dr. Brady’s opinion was “not persuasive.”” (PageID.47)

FACTUAL BACKGROUND

Plaintiff alleged disability based on epilepsy, migraines, memory problems, depression, and overheating, with an alleged onset date of August 24, 2021. The ALJ found severe impairments including anxiety, depression, a learning disorder, epilepsy, and migraine headaches, but determined that Plaintiff retained the residual functional capacity for a full range of work with specified nonexertional limitations. A consultative psychologist, Dr. Michael Brady, opined that Plaintiff had marked impairment in relating to and interacting with others and

moderate impairments in concentration and tolerance for ordinary workplace stress. The district court found that the ALJ inadequately explained why Dr. Brady's opinion was unpersuasive.

PROCEDURAL HISTORY

Plaintiff's applications for DIB and SSI were denied initially on December 5, 2022, and on reconsideration on February 28, 2023. Following a March 20, 2024 administrative hearing, the ALJ issued a decision on April 3, 2024, finding Plaintiff not disabled. The Appeals Council denied review on January 14, 2025. Plaintiff filed this action on March 14, 2025. The district court granted Plaintiff's motion for summary judgment, denied the Commissioner's motion, and remanded under sentence four of 42 U.S.C. § 405(g).

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remand for further proceedings consistent with the Opinion and Order. The ALJ must sufficiently explain the supportability and consistency analysis concerning Dr. Brady's opinion and, if the ALJ again discounts Plaintiff's subjective complaints, must sufficiently explain that reasoning.

CASES CITED

- Colvin v. Barnhart, 475 F.3d 727, 730 (6th Cir. 2007)
- Scheuneman v. Commissioner of Social Security, No. 11-10593, 2011 WL 6937331, at *7 (E.D. Mich. Dec. 6, 2011)
- Heston v. Commissioner of Social Security, 245 F.3d 528, 534-35 (6th Cir. 2001)
- Preslar v. Secretary of Health & Human Services, 14 F.3d 1107, 1110 (6th Cir. 1994)
- Longworth v. Commissioner of Social Security, 402 F.3d 591, 595 (6th Cir. 2005)
- Biestek v. Berryhill, 139 S. Ct. 1148, 1154 (2019)
- Bass v. McMahon, 499 F.3d 506, 512-13 (6th Cir. 2007)
- Wyatt v. Secretary of Health & Human Services, 974 F.2d 680, 683 (6th Cir. 1992)
- Kornecky v. Commissioner of Social Security, 167 F. App'x 496, 508 (6th Cir. 2006)
- Cutlip v. Secretary of Health & Human Services, 25 F.3d 284, 286 (6th Cir. 1994)
- Mistie W. v. Commissioner of Social Security, No. 23-10696, 2024 WL 992160, at *3 (E.D. Mich. Mar. 7, 2024)
- Hardy v. Commissioner of Social Security, 554 F. Supp. 3d 900, 902, 907-08 (E.D. Mich. 2021)
- Hargett v. Commissioner of Social Security, 964 F.3d 546, 552 (6th Cir. 2020)
- Jacob B. v. Commissioner of Social Security, No. 1:20-CV-617, 2022 WL 130761, at *8 (S.D. Ohio Jan. 14, 2022)
- White v. Commissioner of Social Security, No. 1:20-CV-00588-JDG, 2021 WL 858662, at *20 (N.D. Ohio Mar. 8, 2021)

- Tina P. v. Commissioner of Social Security, 2024 WL 1660527, at *14 (E.D. Mich. Apr. 17, 2024)
- James A. M. v. Commissioner of Social Security, No. 22-12334, 2024 WL 1224402, at *3 (E.D. Mich. Mar. 21, 2024)
- Hargett v. Commissioner of Social Security, 964 F.3d 546, 552 (6th Cir. 2020)

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