

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

Gary W. v. Commissioner of Social Security

No. 25-cv-10211 (E.D. Mich. Mar. 11, 2026) · No. 25-cv-10211 · Decided March 11, 2026

SUMMARY

The United States District Court for the Eastern District of Michigan reviews the denial of Gary W.'s application for disability insurance benefits. The court grants the plaintiff's motion for summary judgment, denies the Commissioner's motion, and remands under sentence four of 42 U.S.C. § 405(g) because the ALJ failed to adequately analyze whether the plaintiff had learned to perform his past relevant work as a customer service representative. The court declines to remand for an immediate award of benefits.

CASE DETAILS

COURT	United States District Court for the Eastern District of Michigan, Southern Division
WRITING FOR THE COURT	Elizabeth A. Stafford
JURISDICTION	United States District Court for the Eastern District of Michigan, Southern Division
DECIDED	March 11, 2026
DOCKET	25-cv-10211
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Judicial review of the Commissioner's denial of disability insurance benefits on cross-motions for summary judgment.
STANDARD OF REVIEW	The court reviews the Commissioner's decision under 42 U.S.C. § 405(g) to determine whether it is supported by substantial evidence and conforms to proper legal standards. The court may not independently weigh the evidence or substitute its judgment for the Commissioner's.
PRECEDENTIAL VALUE	Unpublished district court opinion; limited precedential value
PARTIES	Gary W. v. Commissioner of Social Security

TOPICS

judicial review of agency action

summary judgment

administrative law

civil procedure

PRACTICE AREAS

Social Security disability

administrative law

civil procedure

QUESTIONS PRESENTED

1. Whether substantial evidence supported the ALJ's finding that Gary W.'s customer service representative position constituted past relevant work.
2. Whether the court should reverse and award benefits or remand for further administrative consideration.

HOLDINGS

1. An ALJ must consider evidence that a claimant did not actually learn how to perform a job before finding that the job qualifies as past relevant work. The ALJ's failure to analyze Gary W.'s testimony that he could not competently perform the customer service job prevented meaningful judicial review.
2. The case should be remanded for further consideration rather than for an immediate award of benefits because the record did not establish that Gary W. was affirmatively entitled to benefits and conflicting issues remained concerning the proper vocational guideline.

KEY QUOTATIONS

"Substantial evidence, this Court has said, is more than a mere scintilla. It means—and means only—such relevant evidence as a reasonable mind might accept as adequate to support a conclusion." (Part II.A)

"Thus, an ALJ must consider evidence that the plaintiff did not actually learn how to perform a job before finding that it qualifies as past relevant work." (Part II.B)

"Without such analysis, the Court cannot meaningfully review whether substantial evidence supports the ALJ's conclusion that plaintiff could perform past relevant work." (Part II.B)

FACTUAL BACKGROUND

The ALJ found that Gary W. suffered from obesity, coronary artery disease with stenting, hypertension, bilateral hip replacements, osteoarthritis, and coronary arteriosclerosis. The ALJ determined that he could perform restricted light work and concluded, based on vocational-expert testimony, that he could perform past relevant work as a customer service representative. Gary W. testified that the job was new to him, that he did not meet the employer's performance standard despite training, and that he was asked to leave; the court found that the ALJ failed to address this evidence.

PROCEDURAL HISTORY

An administrative law judge found that Gary W. had severe impairments but retained the residual functional capacity for limited light work and could perform his past relevant work as a customer service representative. The Commissioner denied benefits. On judicial review, the parties filed cross-motions for summary judgment. The court granted the plaintiff's motion, denied the Commissioner's motion, and remanded under sentence four

of 42 U.S.C. § 405(g) for further consideration of whether the customer service position qualified as past relevant work.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Commissioner must further consider and explain whether Gary W.'s customer service representative position qualified as past relevant work, including whether he actually learned to perform the job and achieved average performance, and must issue a decision supported by substantial evidence and proper legal standards.

CASES CITED

- Bass v. McMahon, 499 F.3d 506, 513 (6th Cir. 2007)
- Gentry v. Commissioner of Social Security, 741 F.3d 708, 722 (6th Cir. 2014)
- Biestek v. Berryhill, 587 U.S. 97, 102-03 (2019)
- Hatmaker v. Commissioner of Social Security, 965 F. Supp. 2d 917, 930 (E.D. Tenn. 2013)
- Cutlip v. Secretary of Health & Human Services, 25 F.3d 284, 286 (6th Cir. 1994)
- Walters v. Commissioner of Social Security, 127 F.3d 525, 529 (6th Cir. 1997)
- Wright-Hines v. Commissioner of Social Security, 597 F.3d 392, 395 (6th Cir. 2010)
- Bond v. Commissioner of Social Security, No. 6:15-cv-333-Orl-GJK, 2016 WL 3906929, at *3-4 (M.D. Fla. July 19, 2016)
- Cline v. Commissioner of Social Security, 96 F.3d 146, 148 (6th Cir. 1996)
- Medina v. Colvin, No. 3:14-cv-2209, 2015 WL 4660985, at *6 (N.D. Tex. Aug. 6, 2015)
- A.K.T. v. Commissioner of Social Security, No. 09-cv-0680, 2010 WL 3035496, at *2 (W.D. La. Aug. 3, 2010)
- Kavadius v. Barnhart, 306 F. Supp. 2d 804, 814 (N.D. Ill. 2004)
- Gogan v. Astrue, No. 09-93-P-S, 2009 WL 5216062 (D. Me. Dec. 29, 2009)
- Michael T.B. v. Kijakazi, No. 20-cv-1779, 2021 WL 7082736 (D. Minn. Dec. 3, 2021)
- Moad v. Massanari, 260 F.3d 887, 891 (8th Cir. 2001)
- Bingham v. Saul, No. 6:20-CV-185, 2021 WL 1990645, at *4-5 (E.D. Ky. May 18, 2021)
- Hurst v. Secretary of Health & Human Services, 753 F.2d 517, 519 (6th Cir. 1985)
- Earley v. Commissioner of Social Security, 893 F.3d 929, 934 (6th Cir. 2018)
- Faucher v. Secretary of Health & Human Services, 17 F.3d 171, 176 (6th Cir. 1994)
- Miller v. Commissioner of Social Security, 811 F.3d 825, 840 (6th Cir. 2016)
- Donahue v. Massanari, 166 F. Supp. 2d 1143, 1148-50 (E.D. Mich. 2001)
- Yoder v. Commissioner of Social Security, No. 10-14941, 2011 WL 6308313, at *7 (E.D. Mich. Dec. 16, 2011)

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