

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
NEW YORK

Esha J. v. Commissioner of Social Security

Esha J. · No. 5:24-CV-1101 (GTS/MJK) · Decided January 29, 2026

SUMMARY

The United States District Court for the Northern District of New York partially rejected and partially adopted a magistrate judge’s Report and Recommendation in a Social Security disability action. The court found that the ALJ’s determination regarding the materiality of substance abuse was not supported by substantial evidence, vacated the Commissioner’s decision, and remanded for further administrative proceedings before a different ALJ. The court upheld the ALJ’s assessment of the medical opinion concerning the period after September 11, 2023.

CASE DETAILS

COURT	United States District Court for the Northern District of New York
WRITING FOR THE COURT	Glenn T. Suddaby
JURISDICTION	United States District Court for the Northern District of New York
DECIDED	January 29, 2026
DOCKET	5:24-CV-1101 (GTS/MJK)
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought review under 42 U.S.C. § 405(g) of the Commissioner's denial of Social Security benefits. After a magistrate judge recommended denying Plaintiff's motion for judgment on the pleadings and granting the Commissioner's motion, Plaintiff objected. The district court rejected the recommendation in part, granted Plaintiff's motion, denied the Commissioner's motion, vacated the Commissioner's determination, and remanded for further administrative proceedings.
STANDARD OF REVIEW	The district court reviewed objected-to portions of the magistrate judge's report and recommendation de novo under 28 U.S.C. § 636(b)(1)(C) and Fed. R. Civ. P. 72(b)(2). It reviewed only for clear error conclusory or general objections. The Commissioner's decision was reviewed under the substantial-evidence standard.
PRECEDENTIAL VALUE	unpublished district court decision

PARTIES

Esha J. v. Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

motion for judgment on the pleadings

civil procedure

PRACTICE AREAS

Social Security disability

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ's finding that substance abuse was material to Plaintiff's disability before September 11, 2023, was supported by substantial evidence.
2. Whether the ALJ properly relied on Dr. Powers's opinion that Plaintiff's earlier paranoid and other mental-health symptoms were caused by substance use.
3. Whether the ALJ's assessment of NP Masara's opinion for the period after September 11, 2023, was supported by substantial evidence.
4. Whether remand should be for further administrative proceedings or for calculation of benefits.

HOLDINGS

1. The ALJ's conclusion that substance abuse was material to Plaintiff's disability before September 11, 2023, was not supported by substantial evidence because it rested almost entirely on Dr. Powers's opinion, which was inconsistent with the relevant treatment records and lacked evidentiary support.
2. The ALJ's rejection of NP Masara's opinion for the period after September 11, 2023, was supported by substantial evidence.
3. The ALJ could not automatically apply the rationale supporting rejection of NP Masara's opinion for the post-September 11, 2023 period to the earlier period.
4. Remand for further proceedings, rather than calculation of benefits, was warranted.

KEY QUOTATIONS

“Based on the Court’s review of the evidence in the record, there appears to be no substantial basis for Dr. Powers’ conclusion that Plaintiff’s mental health symptoms from March 2020 through September 2023 were the product of substance abuse rather than her mental health impairments” (8)

“As a result, the Court sees no manner in which her opinion (which, again, is the sole basis for the ALJ’s materiality finding) can constitute substantial evidence to support the ALJ’s overall conclusions.” (10)

“This is not a case in which the evidence of disability is so conclusive that the Court should usurp the Agency’s fact-finding duties.” (11)

FACTUAL BACKGROUND

Plaintiff alleged disabling mental-health impairments, including PTSD, anxiety, depression, and symptoms of paranoia, beginning March 5, 2020. The ALJ found that substance abuse materially contributed to Plaintiff's symptoms before September 11, 2023, relying principally on the testimony of reviewing expert Dr. Raychel Powers, while also finding her not disabled during the later period. The district court found that the cited medical records documented only limited marijuana-related treatment in early 2020, periods of abstinence, and continuing mental-health symptoms not shown to be caused by substance use.

PROCEDURAL HISTORY

Magistrate Judge Mitchell J. Katz recommended affirming the Commissioner's decision, concluding that the ALJ's residual functional capacity findings and treatment of the medical opinions were supported by substantial evidence. Plaintiff objected, arguing that the ALJ failed to comply with an Appeals Council remand directive and improperly relied on Dr. Raychel Powers's opinion regarding substance use. The district court agreed that the ALJ's materiality finding was unsupported, adopted the recommendation in part as to the post-September 11, 2023 period, and remanded for further proceedings before a different ALJ.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Commissioner must conduct further administrative proceedings concerning the materiality of substance use before September 11, 2023; reassess the timing and extent of Plaintiff's substance use and its effect on functioning; reassess the relevant medical opinions, including NP Masara's opinion for the pre-September 2023 period; consider and account for the earlier abnormal mental-health evidence; and assign the remand to a different ALJ in accordance with agency policy.

CASES CITED

- Caldwell v. Crosset, 09-CV-0576, 2010 WL 2346330, at *1 (N.D.N.Y. June 9, 2010)
- Farid v. Bouey, 554 F. Supp. 2d 301, 307 (N.D.N.Y. 2008)
- Zhao v. State Univ. of N.Y., 04-CV-0210, 2011 WL 3610717, at *1 (E.D.N.Y. Aug. 15, 2011)
- Hubbard v. Kelley, 752 F. Supp. 2d 311, 312-13 (W.D.N.Y. 2009)