

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF ARIZONA

Monica Van Duerm v. Commissioner of Social Security
Administration

Van Duerm · No. CV-25-00685-PHX-SMB · Decided February 17, 2026

SUMMARY

The United States District Court for the District of Arizona reviewed Monica Van Duerm’s challenge to the Commissioner of Social Security Administration’s denial of disability insurance benefits. The court held that the ALJ provided sufficient reasons for evaluating Van Duerm’s symptom testimony, medical opinion evidence, lay witness testimony, and the step-five vocational evidence. The court affirmed the ALJ’s January 17, 2024 decision and directed the Clerk to enter judgment and close the case.

CASE DETAILS

COURT	United States District Court for the District of Arizona
WRITING FOR THE COURT	Susan M. Brnovich
JURISDICTION	United States District Court for the District of Arizona
DECIDED	February 17, 2026
DOCKET	CV-25-00685-PHX-SMB
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying her application for disability insurance benefits.
STANDARD OF REVIEW	The court reviews the Commissioner's decision for legal error and substantial evidence, considering the entire record as a whole. If the evidence is susceptible to more than one rational interpretation, the court affirms the ALJ's decision.
PRECEDENTIAL VALUE	unpublished, nonprecedential district court order
PARTIES	Monica Van Duerm v. Commissioner of Social Security Administration

TOPICS

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

PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ provided legally sufficient reasons supported by substantial evidence for discounting Plaintiff's symptom testimony.
2. Whether the ALJ properly evaluated the medical opinion of Sanford Goldstein, PT, CDMS.
3. Whether the ALJ properly considered the lay witness reports from Plaintiff's husband and mother.
4. Whether the ALJ's step-five vocational determination was based on a proper hypothetical incorporating all limitations supported by substantial evidence.

HOLDINGS

1. The ALJ did not err in discounting Plaintiff's symptom testimony because the ALJ identified specific, clear, and convincing reasons supported by substantial evidence, including inconsistencies with objective medical evidence and Plaintiff's daily activities.
2. The ALJ did not err in finding Sanford Goldstein's opinion unpersuasive because it was unsupported by and inconsistent with the objective examinations and was rendered significantly after the date last insured without an indication that it applied to the relevant period.
3. The ALJ did not err in declining to find Plaintiff more limited based on her husband's and mother's reports because the reports were generally consistent with Plaintiff's allegations and did not describe limitations beyond those already considered.
4. The ALJ did not err at step five because the hypothetical questions presented to the vocational expert included the limitations that the ALJ found credible and supported by substantial evidence.

KEY QUOTATIONS

"The Court will uphold an ALJ's decision "unless it contains legal error or is not supported by substantial evidence." (Order at 2)

"The standard isn't whether [the] court is convinced, but instead whether the ALJ's rationale is clear enough that it has the power to convince." (Order at 3)

"Viewed as a whole, the ALJ adequately identified which aspects of Plaintiff's testimony were inconsistent with the record and provided clear and convincing reasons, supported by substantial evidence, for discounting her subjective symptom allegations." (Order at 4)

FACTUAL BACKGROUND

Monica Van Duerm applied for Title II disability insurance benefits on June 8, 2021, alleging disability beginning February 16, 2021, based principally on vertigo, dizziness, depression, migraines, and anxiety. After an administrative hearing, the ALJ found her not disabled. The district court relied on medical examinations that were often normal or moderate, reported daily activities including preparing meals, taking her child to school,

caring for dogs, and performing household chores, and the lack of support and consistency for a medical opinion issued after the date last insured.

PROCEDURAL HISTORY

Plaintiff applied for disability insurance benefits, and the claim was denied initially and on reconsideration. Following an administrative hearing, the ALJ issued an unfavorable decision on January 17, 2024. The Appeals Council denied review, making the ALJ's decision the Commissioner's final decision. The district court affirmed the ALJ's decision and directed the Clerk to enter final judgment and close the case.

DISPOSITION

affirmed

CASES CITED

- Tackett v. Apfel, 180 F.3d 1094, 1098, 1101 (9th Cir. 1999)
- Lewis v. Apfel, 236 F.3d 503, 517 n.13 (9th Cir. 2001)
- Orn v. Astrue, 495 F.3d 625, 630 (9th Cir. 2007)
- Bayliss v. Barnhart, 427 F.3d 1211, 1214 n.1, 1217 (9th Cir. 2005)
- Burch v. Barnhart, 400 F.3d 676, 679 (9th Cir. 2005)
- Vasquez v. Astrue, 572 F.3d 586, 591 (9th Cir. 2009)
- Lingenfelter v. Astrue, 504 F.3d 1028, 1036 (9th Cir. 2007)
- Smartt v. Kijakazi, 53 F.4th 489, 499 (9th Cir. 2022)
- Thomas v. Barnhart, 278 F.3d 947, 958-60 (9th Cir. 2002)
- Bray v. Commissioner of Social Security Administration, 554 F.3d 1219, 1227 (9th Cir. 2009)
- Tommasetti v. Astrue, 533 F.3d 1035, 1041 (9th Cir. 2008)
- Kitchen v. Kijakazi, 82 F.4th 732, 739-40 (9th Cir. 2023)
- Woods v. Kijakazi, 32 F.4th 785, 790-92 (9th Cir. 2022)
- SB v. Commissioner of Social Security Administration, No. CV-20-01842-PHX-JAT, 2021 WL 5150092, at *3 (D. Ariz. Nov. 5, 2021)
- Bruce v. Commissioner of Social Security Administration, No. CV-25-00957-PHX-MTL, 2026 WL 194211, at *5 (D. Ariz. Jan. 26, 2026)
- Caleb H. v. Saul, No. 4:20-CV-5006-EFS, 2020 WL 7680556, at *8 (E.D. Wash. Nov. 18, 2020)
- Antahn v. Commissioner of Social Security Administration, No. CV-23-00078-PHX-DLR, 2024 WL 3200696, at *5 (D. Ariz. June 27, 2024)
- Stubbs-Danielson v. Astrue, 539 F.3d 1169, 1175-76 (9th Cir. 2008)