

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
CALIFORNIA

Carter v. Colvin

Carter · No. 24-cv-03062-VC · Decided June 16, 2025

SUMMARY

The United States District Court for the Northern District of California granted the plaintiff's motion to remand a Social Security disability case for further proceedings before the Administrative Law Judge. The court found that the ALJ inadequately explained the rejection of a medical opinion concerning the plaintiff's ability to walk and stand, and failed to provide clear and convincing reasons for discounting the plaintiff's testimony about pain and symptoms. The court declined to remand for an immediate award of benefits and directed the Clerk to close the case.

CASE DETAILS

COURT	United States District Court for the Northern District of California
WRITING FOR THE COURT	Vince Chhabria
JURISDICTION	United States District Court for the Northern District of California
DECIDED	June 16, 2025
DOCKET	24-cv-03062-VC
DISPOSITION	remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review of an administrative decision denying or limiting Social Security benefits and moved to remand.
STANDARD OF REVIEW	The court reviewed the ALJ's decision for legal error and required the ALJ to provide legally sufficient reasons for rejecting medical-opinion evidence and the claimant's symptom testimony.
PRECEDENTIAL VALUE	Unpublished district court order; precedential status is unknown.
PARTIES	E.C.C. v. SSA, et al.

TOPICS

- judicial review of agency action
- administrative law
- remedies
- civil procedure

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether the ALJ adequately explained the rejection of Dr. Reinking's limitation that the plaintiff could walk or stand for no more than two hours in a workday.
2. Whether the ALJ provided clear and convincing reasons for discounting the plaintiff's testimony about the severity of pain and symptoms.
3. Whether the case should be remanded for an immediate award of benefits or for further administrative proceedings.

HOLDINGS

1. The ALJ's residual functional capacity determination was defective because the ALJ failed to explain why Dr. Reinking's references to the plaintiff's right-foot impairment and bilateral knee osteoarthritis did not support the limitation to walking or standing for no more than two hours in a workday.
2. The ALJ failed to provide clear and convincing reasons for discounting the plaintiff's testimony about the severity of pain and symptoms.
3. The case was properly remanded for further proceedings before the ALJ rather than for an immediate award of benefits.

KEY QUOTATIONS

"We have repeatedly warned that ALJs must be especially cautious in concluding that daily activities are inconsistent with testimony about pain, because impairments that would unquestionably preclude work and all the pressures of a workplace environment will often be consistent with doing more than merely resting in bed all day."

FACTUAL BACKGROUND

The ALJ rejected Dr. Reinking's opinion that the plaintiff could walk or stand for only up to two hours in a workday, relying in part on the plaintiff's right-foot impairment, bilateral knee osteoarthritis, normal gait during evaluations, and daily activities. The ALJ also discounted the plaintiff's testimony about the severity of pain and symptoms based on conservative treatment, normal gait observations, and activities such as using public transportation, doing laundry, cooking, and cleaning. The district court concluded that these explanations did not adequately address the relationship between those observations or activities and the plaintiff's ability to walk or stand for extended periods or sustain full-time work.

PROCEDURAL HISTORY

The plaintiff challenged an ALJ's residual functional capacity determination and assessment of the plaintiff's testimony concerning pain and symptoms. The district court granted the motion to remand, rejected a remand for an immediate award of benefits, and remanded for further proceedings before the ALJ.

DISPOSITION

remanded

REMAND INSTRUCTIONS

Remand for further proceedings before the ALJ, including reconsideration of the medical-opinion evidence, the plaintiff's symptom testimony, and the residual functional capacity determination.

CASES CITED

- Garrison v. Colvin, 759 F.3d 995, 1016 (9th Cir. 2014)
- Dominguez v. Colvin, 808 F.3d 403, 407 (9th Cir. 2015)

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