

UNITED STATES DISTRICT COURT FOR THE CENTRAL DISTRICT OF
CALIFORNIA

Martin N. v. Frank Bisignano, Commissioner of Social Security

Martin N. v. Bisignano, No. 8:24-cv-01542-MAA, 2025 WL 2829637 (C.D. Cal. Sept. 19, 2025) · No. 8:24-cv-01542-MAA · Decided September 19, 2025

SUMMARY

The United States District Court for the Central District of California reviewed the Commissioner of Social Security’s denial of the plaintiff’s application for supplemental security income. The court held that substantial evidence supported the ALJ’s mental residual functional capacity determination and that the ALJ properly considered and discounted the lay witness testimony. The court affirmed the Commissioner’s decision and dismissed the action with prejudice.

CASE DETAILS

COURT	United States District Court for the Central District of California
WRITING FOR THE COURT	Maria A. Audero
JURISDICTION	United States District Court for the Central District of California
DECIDED	September 19, 2025
DOCKET	8:24-cv-01542-MAA
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying his application for supplemental security income.
STANDARD OF REVIEW	The court reviewed whether the Commissioner’s findings were supported by substantial evidence and whether the proper legal standards were applied. Substantial evidence is more than a mere scintilla but less than a preponderance and is evidence a reasonable mind might accept as adequate. Where the evidence is susceptible to more than one rational interpretation, the Commissioner's interpretation must be upheld.
PRECEDENTIAL VALUE	unpublished, nonprecedential
PARTIES	Martin N. v. Frank Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

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PRACTICE AREAS

Social Security disability

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QUESTIONS PRESENTED

1. Whether substantial evidence supported the ALJ's mental RFC determination limiting Plaintiff to occasional contact with supervisors, coworkers, and the public despite state-agency opinions that he could perform simple tasks with minimal contact with people.
2. Whether the ALJ properly considered and discounted the lay witness testimony submitted by Plaintiff's uncle.

HOLDINGS

1. The ALJ reasonably translated the state-agency opinions that Plaintiff would function best with minimal contact with people into an RFC limiting him to occasional contact with supervisors, coworkers, and the public.
2. Under the revised Social Security regulations, the ALJ was not required to evaluate lay witness evidence using the same articulation factors applicable to medical opinions, but the ALJ was required to consider the evidence; the ALJ did so here and gave a germane reason for discounting it.

KEY QUOTATIONS

“The RFC does not need to directly correspond to a specific medical opinion; rather, it is the ALJ’s responsibility to weigh conflicting medical evidence and translate accepted medical opinions into “concrete restrictions.”” (at 6)

“Nevertheless, even if the ALJ had failed to state a “germane” reason for discounting Banikazemi’s reports, the failure would be harmless under the circumstances of this case.” (at 9)

FACTUAL BACKGROUND

Plaintiff applied for supplemental security income, alleging disability based on physical and mental impairments, including degenerative disc disease, a shoulder fracture, traumatic brain injury, bipolar disorder with psychotic features, anxiety, and obesity. The ALJ found that Plaintiff could perform light work subject to physical and mental restrictions, including simple and routine tasks, occasional contact with supervisors, coworkers, and the public, and no fast-paced production requirements. A vocational expert identified jobs existing in significant numbers that Plaintiff could perform. Plaintiff challenged the mental RFC assessment and the ALJ's treatment of third-party statements from his uncle.

PROCEDURAL HISTORY

Plaintiff filed an SSI application in May 2020. The application was denied initially and on reconsideration; following an administrative hearing, an ALJ denied benefits on August 28, 2023, and the Appeals Council

denied review on May 30, 2024. The district court affirmed the Commissioner's decision and dismissed the action with prejudice.

DISPOSITION

affirmed

CASES CITED

- Treichler v. Commissioner of Social Security Administration, 775 F.3d 1090, 1098 (9th Cir. 2014)
- Richardson v. Perales, 402 U.S. 389, 401 (1971)
- Lingenfelter v. Astrue, 504 F.3d 1028, 1035 (9th Cir. 2007)
- Orn v. Astrue, 495 F.3d 625, 630 (9th Cir. 2007)
- Reddick v. Chater, 157 F.3d 715, 724 (9th Cir. 1998)
- Smolen v. Chater, 80 F.3d 1273, 1291 (9th Cir. 1996)
- Valentine v. Commissioner Social Security Administration, 574 F.3d 685, 690, 694 (9th Cir. 2009)
- Stubbs-Danielson v. Astrue, 539 F.3d 1169, 1174 (9th Cir. 2008)
- Rounds v. Commissioner of Social Security Administration, 807 F.3d 996, 1006 (9th Cir. 2015)
- Woods v. Kijakazi, 32 F.4th 785, 792 (9th Cir. 2022)
- Foster v. Kijakazi, 2022 WL 3230472, at *2 (9th Cir. 2022)
- Willie Q. W. v. Bisignano, 2025 WL 2495535, at *9 (C.D. Cal. Aug. 27, 2025)
- Leach v. Kijakazi, 70 F.4th 1251, 1258 (9th Cir. 2023)
- Hernandez v. O'Malley, 2024 WL 1596463, at *2 (9th Cir. 2024)
- Addison J. T. v. Bisignano, 2025 WL 2531500, at *4 (C.D. Cal. Aug. 29, 2025)
- Kimberly H. v. Saul, 2021 WL 3861156, at *6 (D. Or. Aug. 30, 2021)
- Ruiz v. Commissioner of Social Security, 2023 WL 6306457, at *8 (D. Ariz. Sept. 28, 2023)
- Trogdon v. O'Malley, 2024 WL 3949081, at *1 (9th Cir. 2024)
- Fryer v. Kijakazi, 2022 WL 17958630, at *3 n.1 (9th Cir. 2022)
- Stephens v. Kijakazi, 2023 WL 6937296, at *2 (9th Cir. 2023)
- Joseph L. S. v. Kijakazi, 2023 WL 5611408, at *5 (C.D. Cal. Aug. 30, 2023)
- Mahnaz M. v. Kijakazi, 2024 WL 21794, at *8 (S.D. Cal. Jan. 2, 2024)
- Schilling v. Commissioner of Social Security, 2022 WL 17418343, at *14 (E.D. Cal. Dec. 5, 2022)
- Neri v. Commissioner of Social Security, 2022 WL 16856160, at *7 (E.D. Cal. Nov. 10, 2022)
- Vincent ex rel. Vincent v. Heckler, 739 F.2d 1393, 1395 (9th Cir. 1984)
- Collie v. Saul, 837 F. App'x 497, 499 (9th Cir. 2021)
- Bayliss v. Barnhart, 427 F.3d 1211, 1218 (9th Cir. 2005)
- Pierre R. v. Kijakazi, 2022 WL 2829637, at *6 (C.D. Cal. July 20, 2022)
- Johnson v. Kijakazi, 2022 WL 3998572, at *2 (9th Cir. 2022)

