UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

STEVEN BRUNO,)
Plaintiff,)
vs.)
)
CAROLYN W. COLVIN,)
Acting Commissioner,)
Social Security Administration,)
Defendant.)

Civil Action No. 1:16-CV-10794-NMG

Plaintiff's Motion for Order Reversing the Commissioner's Decision

As grounds for this Motion, the Plaintiff asserts that the Commissioner's decision is unsupported by substantial evidence and therefore should be reversed. Further, "given the obduracy evidenced by the action of the administrative agency after remand, we remand the case to the agency with directions that the application for benefits be granted." Wilder v. Apfel, 153 F.3d 799, 804 (7th Cir. 1998).

Question Presented for Review

Is the Commissioner's decision supported by substantial evidence?

Plaintiff's Supporting Memorandum for Order Reversing the Commissioner's Decision

Mr. Bruno is now beyond his date last insured. If he is forced to return to "past relevant work as generally performed," as this seriously flawed decision requires, in a position requiring him to stare "constantly," with his one good eye, at a computer screen for hours, days, and weeks on end, he will, sooner rather than later, be blind. (See, *e.g.*, 7/13/16 note of Chirag P. Shah, attached as ex. A). That is definitely NOT the intent of our *Social Security Act.*

The initial decision was flawed because:

1. It disregarded the left shoulder impairment and was inadequate regarding the left hip surgery. (ORDER OF APPEALS COUNCIL at 1).

Motion allowed. /s/ NMG Gorton, USDJ 11/9/16