

UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF
PENNSYLVANIA

Nathaniel Aaron Finkin v. Frank Bisignano, Commissioner of Social
Security

Civil No. 4:24-CV-02180 · No. Civil No. 4:24-CV-02180 · Decided December 18, 2025

SUMMARY

The United States District Court for the Middle District of Pennsylvania remanded Nathaniel Aaron Finkin’s Social Security disability case for further consideration. The court held that the ALJ failed to adequately explain why the claimant’s repeated reports and medical-record evidence of severe fatigue were not credited or incorporated into the residual functional capacity assessment. The court did not reach the claimant’s separate challenge to the evaluation of a consultative examiner’s opinion.

CASE DETAILS

COURT	United States District Court for the Middle District of Pennsylvania
WRITING FOR THE COURT	Martin C. Carlson
JURISDICTION	United States District Court for the Middle District of Pennsylvania
DECIDED	December 18, 2025
DOCKET	Civil No. 4:24-CV-02180
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Appeal from the Commissioner's denial of the plaintiff's Title II disability insurance benefits application.
STANDARD OF REVIEW	The court reviews the Commissioner's factual findings for substantial evidence and reviews legal issues plenary. The court may not reweigh the evidence or substitute its judgment for the ALJ's, but must determine whether the ALJ adequately articulated the reasoning connecting the evidence to the RFC and ultimate decision.
PRECEDENTIAL VALUE	Nonprecedential district court memorandum opinion
PARTIES	Nathaniel Aaron Finkin v. Frank Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action

agency adjudication

administrative law

disability definition

ada / disability

PRACTICE AREAS

Social Security disability

administrative law

judicial review of agency action

QUESTIONS PRESENTED

1. Whether the ALJ adequately evaluated and articulated the reasons for rejecting or failing to accommodate the claimant's subjective complaints of work-preclusive fatigue.
2. Whether the ALJ's RFC determination was supported by substantial evidence when it included no limitations for off-task time, rest, or absenteeism related to fatigue.
3. Whether the ALJ's failure to explain the omission of fatigue-related limitations required remand.

HOLDINGS

1. The ALJ failed to satisfy the duty of articulation because the decision did not specifically explain why the claimant's consistent statements about work-preclusive fatigue were not credited despite medical records and third-party evidence corroborating those statements.
2. The RFC was not adequately supported because it included no accommodation for fatigue-related off-task time or absenteeism and the ALJ did not explain that omission.

KEY QUOTATIONS

“At a minimum, this duty of articulation requires the ALJ to draw a legal and logical bridge between any factual findings and the final conclusion denying the disability claim.” (at 2)

“On this record, the ALJ simply has not created a logical bridge between the evidence summarized in the decision and the limitations in the RFC which are completely devoid of any accommodation for these symptoms.” (at 29)

“It is axiomatic that the ALJ's decision must be accompanied by “a clear and satisfactory explication of the basis on which it rests.”” (at 30)

FACTUAL BACKGROUND

Nathaniel Finkin alleged that type 2 diabetes and related symptoms, especially chronic fatigue, prevented him from sustaining full-time work. He testified that he fell asleep at his desk, needed to rest after working for approximately an hour, and took multiple daily naps; his former employer similarly reported that fatigue and frequent bathroom breaks made him unable to complete basic shifts. Medical records repeatedly documented significant or “crushing” fatigue, including a need to stop driving to nap, but the ALJ adopted an RFC with no limitation for off-task time, rest, or absenteeism attributable to fatigue.

PROCEDURAL HISTORY

Finkin applied for disability insurance benefits, alleging disability beginning April 2, 2021, primarily because of diabetes-related fatigue and frequent urination. After a hearing on December 18, 2023, the ALJ denied benefits on February 8, 2024. Finkin sought judicial review, arguing in part that the ALJ failed to address his need to rest or lie down during the day. The district court vacated the Commissioner's decision and remanded for a new administrative hearing.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The Commissioner must conduct a new administrative hearing and further consider and evaluate the evidence, including the claimant's fatigue, the medical evidence documenting fatigue, third-party corroboration, and whether fatigue warrants limitations for off-task time, rest, or absenteeism. The opinion does not direct a particular ultimate disability determination.

CASES CITED

- *Uncapher v. Colvin*, No. 02:13-CV-00886, 2014 WL 1316132, at *8 (W.D. Pa. Apr. 1, 2014)
- *Hartranft v. Apfel*, 181 F.3d 358, 362 (3d Cir. 1999)
- *Williams v. Sullivan*, 970 F.2d 1178, 1184-85 (3d Cir. 1992)
- *Burnett v. Commissioner of Social Security Administration*, 220 F.3d 112, 119-21 (3d Cir. 2000)
- *Cotter v. Harris*, 642 F.2d 700, 704, 706-07 (3d Cir. 1981)
- *Johnson v. Commissioner of Social Security*, 529 F.3d 198, 200 (3d Cir. 2008)
- *Pierce v. Underwood*, 487 U.S. 552, 565 (1988)
- *Richardson v. Perales*, 402 U.S. 389, 401 (1971)
- *Mason v. Shalala*, 994 F.2d 1058, 1064, 1066 (3d Cir. 1993)
- *Consolo v. Federal Maritime Commission*, 383 U.S. 607, 620 (1966)
- *Leslie v. Barnhart*, 304 F. Supp. 2d 623, 627 (M.D. Pa. 2003)
- *Biestek v. Berryhill*, 139 S. Ct. 1148, 1154 (2019)
- *Diaz v. Commissioner of Social Security*, 577 F.3d 500, 504, 506 (3d Cir. 2009)
- *Zirnsak v. Colvin*, 777 F.3d 607, 611-13 (3d Cir. 2015)
- *Wright v. Sullivan*, 900 F.2d 675, 678 (3d Cir. 1990)
- *Ficca v. Astrue*, 901 F. Supp. 2d 533, 536 (M.D. Pa. 2012)
- *Chandler v. Commissioner of Social Security*, 667 F.3d 356, 363 (3d Cir. 2012)
- *Schaudeck v. Commissioner of Social Security*, 181 F.3d 429, 433 (3d Cir. 1999)
- *McKean v. Colvin*, 150 F. Supp. 3d 406, 415-16 (M.D. Pa. 2015)
- *Brooks v. Kijakazi*, No. CV 21-1312, 2021 WL 5997983, at *2 (E.D. Pa. Dec. 20, 2021)
- *Kanary v. Berryhill*, No. CV 17-1027, 2018 WL 4620696, at *4 (W.D. Pa. Sept. 26, 2018)

