

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF  
ILLINOIS, EASTERN DIVISION

Neeran S. v. Frank Bisignano

Neeran S. · No. No. 25 CV 4367 · Decided March 31, 2026

SUMMARY

The United States District Court for the Northern District of Illinois reviewed the Social Security Commissioner’s denial of Neeran S.’s application for disability insurance benefits. The court held that the administrative law judge’s decision was supported by substantial evidence, that any failure to evaluate one treating provider’s opinion was harmless, and that the assessment of the plaintiff’s symptoms was adequate. The court denied the motion to reverse and remand and affirmed the Commissioner’s decision.

CASE DETAILS

|                       |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| COURT                 | United States District Court for the Northern District of Illinois, Eastern Division                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| WRITING FOR THE COURT | Manish S. Shah                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| JURISDICTION          | United States District Court for the Northern District of Illinois, Eastern Division                                                                                                                                                                                                                                                                                                                                                                                                                                                   |
| DECIDED               | March 31, 2026                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| DOCKET                | No. 25 CV 4367                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
| DISPOSITION           | affirmed                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
| PROCEDURAL POSTURE    | Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner of Social Security's denial of disability insurance benefits. The court denied plaintiff's motion to reverse and remand, affirmed the administrative law judge's decision, entered judgment for the Commissioner, and terminated the case.                                                                                                                                                                                                               |
| STANDARD OF REVIEW    | The court reviews the Commissioner's final decision deferentially and must affirm if the ALJ applied the law correctly and supported the decision with substantial evidence. The court does not reweigh evidence or substitute its judgment for the ALJ's. Review of the ALJ's assessment of subjective symptoms is limited to determining whether the determination was patently wrong. Harmless-error review applies, and remand is unwarranted where the court can predict with great confidence that the result would be the same. |

|                           |                                                               |
|---------------------------|---------------------------------------------------------------|
| <b>PRECEDENTIAL VALUE</b> | unpublished district court memorandum opinion                 |
| <b>PARTIES</b>            | Neeran S. v. Frank Bisignano, Commissioner of Social Security |

## TOPICS

judicial review of agency action   administrative law   agency adjudication   disability definition

## PRACTICE AREAS

Social Security disability   administrative law   judicial review of agency action

## QUESTIONS PRESENTED

1. Whether the ALJ adequately evaluated Dr. Brikha's medical opinion under the supportability and consistency requirements.
2. Whether the ALJ's failure to expressly evaluate Dr. Samimy's medical opinion required remand or was harmless error.
3. Whether the ALJ properly evaluated plaintiff's subjective symptoms and alleged limitations concerning sitting, standing, position changes, vertigo, and thalassemia.
4. Whether substantial evidence supported the ALJ's residual functional capacity assessment and conclusion that plaintiff was not disabled.

## HOLDINGS

1. The ALJ did not err in finding Dr. Brikha's opinion unpersuasive as to permanent work-related restrictions because the ALJ adequately addressed the opinion's supportability and consistency.
2. The ALJ erred by failing to properly evaluate Dr. Samimy's medical opinion, but the error was harmless and did not require remand.
3. The ALJ adequately evaluated plaintiff's subjective symptoms, and the assessment was not patently wrong.
4. Substantial evidence supported the ALJ's decision that plaintiff was not disabled and could perform other work existing in significant numbers in the national economy.

## KEY QUOTATIONS

*“Substantial evidence is not a high threshold. It means “such relevant evidence as a reasonable mind might accept as adequate to support a conclusion.””* (at 2)

*“An ALJ need not address every piece or category of evidence identified by the claimant.”* (at 6)

*“Courts “will not remand a case to the ALJ for further specification where we are convinced that the ALJ will reach the same result.””* (at 8)

*“In assessing whether an error is harmless, courts examine the record to determine whether they can “predict with great confidence what the result of remand will be.””* (at 8)

## FACTUAL BACKGROUND

Neeran S. alleged disability based principally on degenerative disc disease, back pain, vertigo, thalassemia, depression, anxiety, and posttraumatic stress disorder. The ALJ found severe impairments involving lumbar degenerative disc disease and mental disorders, but found thalassemia non-severe and determined that no impairment met or equaled a listed impairment. The ALJ assessed a residual functional capacity for light work with exertional, postural, and mental limitations, relying in part on generally normal strength and sensory findings, plaintiff's treadmill use, and limited evidence of recurring fainting. The district court concluded that the ALJ's evaluation of the medical opinions and subjective symptoms was legally adequate or harmless and that substantial evidence supported the denial of benefits.

## PROCEDURAL HISTORY

Plaintiff applied for disability insurance benefits in December 2021, alleging disability beginning November 15, 2020. The Social Security Administration denied the application initially and on reconsideration. After a December 2023 hearing, the ALJ issued an unfavorable decision in March 2024, and the Appeals Council denied review. Plaintiff then filed this action for judicial review.

## DISPOSITION

affirmed

## CASES CITED

- *Kruckow v. Bisignano*, 2026 WL 27807, at \*2 (7th Cir. Jan. 5, 2026)
- *Swiecichowski v. Dudek*, 133 F.4th 751, 756 (7th Cir. 2025)
- *Biestek v. Berryhill*, 587 U.S. 97, 103 (2019)
- *Consolidated Edison Co. v. NLRB*, 305 U.S. 197, 229 (1938)
- *Wilder v. Kijakazi*, 22 F.4th 644, 651 (7th Cir. 2022)
- *Wright v. United States*, 139 F.3d 551, 553 (7th Cir. 1998)
- *Myles v. Astrue*, 582 F.3d 672, 676, 678 (7th Cir. 2009)
- *Warnell v. O'Malley*, 97 F.4th 1050, 1053 (7th Cir. 2024)
- *Stepp v. Colvin*, 795 F.3d 711, 719 (7th Cir. 2015)
- *Kelley v. Colvin*, 2025 WL 25959, at \*4 (7th Cir. Jan. 3, 2025)
- *Butler v. Kijakazi*, 4 F.4th 498, 504 (7th Cir. 2021)
- *Hohman v. Kijakazi*, 72 F.4th 248, 251 (7th Cir. 2023)
- *Knox v. Astrue*, 327 Fed. App'x 652, 655 (7th Cir. 2009)