

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF
ALABAMA

Lisa Keel v. Frank Bisignano, Commissioner of Social Security

Keel · No. 5:25-cv-480-EGL · Decided January 20, 2026

SUMMARY

The United States District Court for the Northern District of Alabama reviewed the denial of Lisa Keel’s applications for disability insurance benefits and supplemental security income. The court held that the Administrative Law Judge applied the proper standard for evaluating subjective symptoms and that the residual functional capacity determination was supported by substantial evidence. The court affirmed the Commissioner’s decision.

CASE DETAILS

COURT	United States District Court for the Northern District of Alabama
WRITING FOR THE COURT	Edmund G. LaCour Jr.
JURISDICTION	United States District Court for the Northern District of Alabama
DECIDED	January 20, 2026
DOCKET	5:25-cv-480-EGL
DISPOSITION	affirmed
PROCEDURAL POSTURE	Judicial review under 42 U.S.C. §§ 405(g) and 1383(c)(3) of the Commissioner of Social Security's final decision denying applications for disability insurance benefits and supplemental security income.
STANDARD OF REVIEW	The court reviews whether the Commissioner's decision is supported by substantial evidence and rests on the correct legal standards. The court may not reweigh the evidence or substitute its judgment for that of the Commissioner.
PRECEDENTIAL VALUE	unknown
PARTIES	Lisa Keel v. Frank Bisignano, Commissioner of Social Security

TOPICS

- judicial review of agency action
- administrative law
- exhaustion of remedies
- disability definition

PRACTICE AREAS

QUESTIONS PRESENTED

1. Whether substantial evidence supported the ALJ's evaluation of Keel's subjective complaints of pain and other disabling symptoms.
2. Whether substantial evidence supported the ALJ's residual functional capacity determination limiting Keel to a modified range of light work.

HOLDINGS

1. The ALJ properly applied the Eleventh Circuit pain standard, considered Keel's subjective statements in light of the objective medical evidence and the record as a whole, and articulated explicit and adequate reasons for finding that her alleged disabling symptoms were not fully supported.
2. The ALJ's determination that Keel could perform a modified range of light work was supported by substantial evidence and complied with the applicable legal standards.

FACTUAL BACKGROUND

Keel alleged disability beginning April 15, 2021, based principally on Crohn's disease, irritable bowel disease, COPD, chronic pancreatitis, and degenerative disc disease. The medical record repeatedly showed no active Crohn's disease, generally normal gait, strength, sensation, and respiratory findings, although later records documented left L5 nerve-root irritation and mild lumbar abnormalities. The ALJ found that Keel could perform a modified range of light work and could perform several jobs existing in significant numbers in the national economy.

PROCEDURAL HISTORY

Keel's applications were denied initially, on reconsideration, and after an administrative hearing. The Appeals Council twice vacated and remanded prior ALJ decisions. After the ALJ again found Keel not disabled on January 8, 2025, the Appeals Council denied review on February 25, 2025, making that decision final. Keel timely sought judicial review, and the district court affirmed.

DISPOSITION

affirmed

CASES CITED

- Winschel v. Commissioner of Social Security, 631 F.3d 1176, 1178 (11th Cir. 2011)
- Biestek v. Berryhill, 587 U.S. 97, 103 (2019)
- Henry v. Commissioner of Social Security, 802 F.3d 1264, 1267 (11th Cir. 2015)
- Crawford v. Commissioner of Social Security, 363 F.3d 1155, 1158-59 (11th Cir. 2004)
- Wilson v. Barnhart, 284 F.3d 1219, 1225 (11th Cir. 2002)
- Raper v. Commissioner of Social Security, 89 F.4th 1261, 1277 (11th Cir. 2024)

- Hargress v. Social Security Administration, Commissioner, 883 F.3d 1302, 1307 (11th Cir. 2018)
- Holt v. Sullivan, 921 F.2d 1221, 1223 (11th Cir. 1991)
- Foote v. Chater, 67 F.3d 1553, 1562 (11th Cir. 1995)
- Werner v. Commissioner of Social Security, 421 F. App'x 935, 939 (11th Cir. 2011)
- Coley v. Commissioner of Social Security, 771 F. App'x 913, 917 (11th Cir. 2019)
- Dyer v. Barnhart, 395 F.3d 1206, 1210 (11th Cir. 2005)
- Robinson v. Astrue, 365 F. App'x 993, 999 (11th Cir. 2010)
- Mitchell v. Commissioner of Social Security, 771 F.3d 780, 782 (11th Cir. 2014)
- Cowart v. Schweiker, 662 F.2d 731, 735 (11th Cir. 1981)
- Moore v. Barnhart, 405 F.3d 1208, 1213 (11th Cir. 2005)
- Ted Martin v. Louis W. Sullivan, Secretary of the Department of Health and Human Services, Martin v. Sullivan, 894 F.2d 1520, 1529 (11th Cir. 1990)
- Graham v. Bowen, 790 F.2d 1572, 1575 (11th Cir. 1986)