

UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF
VIRGINIA, RICHMOND DIVISION

Steven P. v. Frank Bisignano

Steven P. · No. 3:25-cv-76-SLS · Decided March 24, 2026

SUMMARY

The United States District Court for the Eastern District of Virginia reviews the denial of Steven P.'s application for Social Security disability insurance benefits. The court concludes that the Administrative Law Judge applied the correct legal standards, properly evaluated the claimant's subjective complaints and medical opinion evidence, and supported the residual functional capacity determination with substantial evidence. The court denies the claimant's motions, grants the Commissioner's motion for summary judgment, and affirms the Commissioner's final decision.

CASE DETAILS

COURT	United States District Court for the Eastern District of Virginia, Richmond Division
WRITING FOR THE COURT	Summer L. Speight
JURISDICTION	United States District Court for the Eastern District of Virginia, Richmond Division
DECIDED	March 24, 2026
DOCKET	3:25-cv-76-SLS
DISPOSITION	affirmed
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's denial of Title II disability insurance benefits. The parties filed cross-motions for summary judgment, and the case was decided by consent of the parties under 28 U.S.C. § 636(c)(1).
STANDARD OF REVIEW	The court affirmed if the ALJ applied correct legal standards and the factual findings were supported by substantial evidence. Substantial evidence means more than a scintilla but less than a preponderance and is evidence that a reasonable mind could accept as adequate. The court could not reweigh conflicting evidence, make credibility determinations, or substitute its judgment for the ALJ's.
PRECEDENTIAL VALUE	unpublished district court opinion

PARTIES

Steven P. v. Frank Bisignano, Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

disability definition

agency adjudication

PRACTICE AREAS

Social Security disability

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ properly evaluated Plaintiff's subjective complaints and whether substantial evidence supported the resulting residual functional capacity determination.
2. Whether the ALJ properly evaluated the medical opinions and prior administrative medical findings under 20 C.F.R. § 404.1520c.
3. Whether the ALJ's residual functional capacity findings required different vocational-expert hypotheticals or a finding that Plaintiff was limited to sedentary work.

HOLDINGS

1. The ALJ applied the required two-step process for evaluating subjective symptoms, reasonably explained the inconsistencies between Plaintiff's allegations and the record, and supported the RFC determination with substantial evidence.
2. Substantial evidence supported the ALJ's finding that Plaintiff could perform light work with limitations on sitting, standing, postural activities, left-arm reaching and pushing or pulling, handling, environmental exposure, and workplace hazards.
3. The ALJ properly evaluated the medical opinions and prior administrative findings by addressing their supportability and consistency and reasonably found certain opinions unpersuasive.
4. Because the RFC determination was supported by substantial evidence, the vocational-expert hypotheticals did not contain reversible error.

KEY QUOTATIONS

"At the second step, "after finding a medically determinable impairment, the ALJ must assess the intensity and persistence of the alleged symptoms to determine how they affect the claimant's ability to work and whether the claimant is disabled."" (R. at 28)

"The ALJ must articulate the "persuasiveness" of all medical opinions by considering five factors: (1) supportability; (2) consistency; (3) relationship with the claimant; (4) specialization; and (5) "other factors that tend to support or contradict a medical opinion[,]"" (R. at 32)

FACTUAL BACKGROUND

Plaintiff alleged disability based on lumbar degenerative disease and spinal stenosis, left shoulder impairments, diabetes, acute congestive heart failure, cirrhosis, anemia, obesity, and related symptoms. The medical record showed some lumbar and left shoulder abnormalities, but generally normal strength, sensation, gait, grip, and lower-extremity findings, with leg swelling resolving after a brief hospitalization. The ALJ found Plaintiff capable of restricted light work and determined at step five that he could perform jobs existing in significant numbers in the national economy.

PROCEDURAL HISTORY

Plaintiff applied for disability insurance benefits on October 21, 2021, alleging disability beginning April 20, 2021. The SSA denied the application initially and on reconsideration; following an administrative hearing, an ALJ found Plaintiff not disabled on February 22, 2024, and the Appeals Council denied review on December 20, 2024. Plaintiff then sought judicial review, and the district court denied his motions for summary judgment and remand, granted the Commissioner's motion, and affirmed the Commissioner's final decision.

DISPOSITION

affirmed

CASES CITED

- Mascio v. Colvin, 780 F.3d 632, 634-35 (4th Cir. 2015)
- Bowen v. Yuckert, 482 U.S. 137, 146 n.5 (1987)
- Hancock v. Astrue, 667 F.3d 470, 472 (4th Cir. 2012)
- Arakas v. Commissioner, Social Security Administration, 983 F.3d 83, 95 (4th Cir. 2020)
- Bird v. Commissioner of Social Security Administration, 699 F.3d 337, 340 (4th Cir. 2012)
- Craig v. Chater, 76 F.3d 585, 589 (4th Cir. 1996)
- Dunn v. Colvin, 607 F. App'x 264, 274 (4th Cir. 2015)
- Clarke v. Bowen, 843 F.2d 271, 272-73 (8th Cir. 1988)
- Johnson v. Barnhart, 434 F.3d 650, 653 (4th Cir. 2005)
- Breeden v. Weinberger, 493 F.2d 1002, 1007 (4th Cir. 1974)
- Universal Camera Corp. v. N.L.R.B., 340 U.S. 474, 488 (1951)
- Monroe v. Colvin, 826 F.3d 176, 189 (4th Cir. 2016)