

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Danielle W. v. Frank Bisignano, Commissioner, Social Security Administration

Danielle W. v. Bisignano, Civil No. 24-3516-DRM (D. Md. Mar. 6, 2026) · No. Civil No. 24-3516-DRM · Decided March 6, 2026

SUMMARY

The United States District Court for the District of Maryland reviews the denial of Danielle W.'s applications for Disability Insurance Benefits and Supplemental Security Income. The court holds that the Administrative Law Judge improperly relied on objective medical findings to discount subjective symptoms associated with major depressive disorder, contrary to Fourth Circuit precedent. The court reverses the Commissioner's decision and remands the case for further proceedings under sentence four of 42 U.S.C. § 405(g).

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	Douglas R. Miller
JURISDICTION	United States District Court for the District of Maryland
DECIDED	March 6, 2026
DOCKET	Civil No. 24-3516-DRM
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Commissioner's final decision denying her applications for Disability Insurance Benefits and Supplemental Security Income. The parties consented to referral to a United States magistrate judge, and the court reviewed the administrative record and briefs without a hearing.
STANDARD OF REVIEW	The court reviews whether the ALJ's factual findings are supported by substantial evidence and whether the ALJ applied the correct legal standards. Substantial evidence is evidence that a reasoning mind would accept as sufficient to support a conclusion; it is more than a mere scintilla but may be less than a preponderance.
PRECEDENTIAL VALUE	unpublished or nonprecedential district court memorandum opinion

PARTIES

Danielle W. v. Frank Bisignano, Commissioner, Social Security Administration

TOPICS

judicial review of agency action

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disability definition

PRACTICE AREAS

Social Security disability

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QUESTIONS PRESENTED

1. Whether the ALJ improperly evaluated Plaintiff's subjective complaints by relying on objective medical evidence to discount symptoms of major depressive disorder.
2. Whether the ALJ's evaluation of Plaintiff's symptoms and resulting residual functional capacity determination was supported by substantial evidence and complied with governing Fourth Circuit precedent.

HOLDINGS

1. An ALJ may not rely on objective medical evidence, even as one factor among several, to discount a claimant's subjective complaints regarding symptoms of chronic depression or major depressive disorder.
2. The ALJ's decision was not supported by substantial evidence because the ALJ improperly increased Plaintiff's burden of proof by effectively requiring objective medical validation of subjective statements concerning her depressive symptoms.

KEY QUOTATIONS

"we join those circuits by holding that ALJs may not rely on objective medical evidence (or the lack thereof)—even as just one of multiple factors—to discount a claimant's subjective complaints regarding symptoms of fibromyalgia or some other disease that does not produce such evidence." (5)

"Because the ALJ improperly increased Plaintiff's burden of proof, in effectively requiring that subjective statements be validated by objective medical evidence, the Court must find error." (6)

"Thus, the Court is unable to find that the ALJ's determination is supported by substantial evidence and finds that remand is required." (6)

FACTUAL BACKGROUND

Plaintiff applied for Disability Insurance Benefits and Supplemental Security Income, alleging disability based primarily on psychiatric impairments, including major depressive disorder, post-traumatic stress disorder, obsessive-compulsive disorder, generalized anxiety disorder, bipolar disorder, and gender dysphoria. The ALJ found that Plaintiff had severe impairments but retained the residual functional capacity for work with nonexertional limitations and could perform jobs existing in significant numbers in the national economy. In

evaluating Plaintiff's subjective symptoms, the ALJ relied in part on clinical observations such as normal attention and concentration, appropriate affect, and decreased suicidal ideation.

PROCEDURAL HISTORY

Plaintiff filed Title II and Title XVI benefits applications in March 2021. The claims were denied initially and on reconsideration. Following a March 27, 2024 hearing, an administrative law judge found Plaintiff not disabled on May 6, 2024. The Appeals Council denied review, making the ALJ's decision the Commissioner's final decision. The district court reversed and remanded under sentence four of 42 U.S.C. § 405(g).

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

The case was remanded for further proceedings and further review consistent with the opinion, including reevaluation of Plaintiff's subjective statements and the residual functional capacity determination without relying improperly on objective medical evidence to discount symptoms of major depressive disorder.

CASES CITED

- Craig v. Chater, 76 F.3d 585, 589, 594-95 (4th Cir. 1996)
- Sims v. Apfel, 530 U.S. 103, 106-07 (2000)
- Kiser v. Saul, 821 F. App'x 211, 212 (4th Cir. 2020)
- Hancock v. Astrue, 667 F.3d 470, 472 (4th Cir. 2012)
- Coffman v. Bowen, 829 F.2d 514, 517 (4th Cir. 1987)
- Laws v. Celebrezze, 368 F.2d 640, 642 (4th Cir. 1966)
- Sterling Smokeless Coal Co. v. Akers, 131 F.3d 438, 439-40 (4th Cir. 1997)
- DeLoatch v. Heckler, 715 F.2d 148, 150 (4th Cir. 1983)
- Arakas v. Commissioner, Social Security Administration, 983 F.3d 83, 95-97 (4th Cir. 2020)
- Walker v. Bowen, 889 F.2d 47, 49 (4th Cir. 1989)
- Oakes v. Kijakazi, 70 F.4th 207, 215 (4th Cir. 2023)
- Shelley C. v. Commissioner of Social Security Administration, 61 F.4th 341, 359-61 (4th Cir. 2023)
- Lewis v. Berryhill, 858 F.3d 858, 866 (4th Cir. 2017)