

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

Natalie M. v. Frank Bisignano, Social Security Administration

Natalie M. · No. 1:25-cv-0786-JMC · Decided December 16, 2025

SUMMARY

The United States District Court for the District of Maryland reviews the Social Security Administration’s denial of Natalie M.’s claims for disability insurance benefits and supplemental security income. The court reverses and remands under sentence four of 42 U.S.C. § 405(g), holding that the administrative decision improperly evaluated the claimant’s fibromyalgia symptoms by relying on objective evidence and conservative treatment in a manner inconsistent with Fourth Circuit precedent.

CASE DETAILS

COURT	United States District Court for the District of Maryland
WRITING FOR THE COURT	J. Mark Coulson
JURISDICTION	United States District Court for the District of Maryland
DECIDED	December 16, 2025
DOCKET	1:25-cv-0786-JMC
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Judicial review of the Social Security Administration's final decision denying disability insurance benefits and supplemental security income; the parties filed dispositive submissions and the matter was decided without a hearing.
STANDARD OF REVIEW	The court must uphold the agency decision if it is supported by substantial evidence and reached through application of the proper legal standard. The court does not reweigh conflicting evidence, make credibility determinations, or substitute its judgment for that of the ALJ.
PRECEDENTIAL VALUE	Unpublished district court opinion; persuasive value only.
PARTIES	Natalie M. v. Frank Bisignano, Social Security Administration

TOPICS

- judicial review of agency action
- administrative law
- civil procedure

PRACTICE AREAS

Social Security disability benefits

administrative law

federal civil procedure

QUESTIONS PRESENTED

1. Whether the ALJ and Appeals Council supported the RFC determination with substantial evidence and applied the correct legal standard in evaluating Plaintiff's fibromyalgia symptoms.
2. Whether the ALJ improperly relied on objective medical findings and conservative treatment to discount Plaintiff's subjective reports of fibromyalgia-related pain and limitations.
3. Whether the RFC and resulting step-five determination were adequately supported in light of the allegedly improper evaluation of fibromyalgia.

HOLDINGS

1. The ALJ and Appeals Council improperly evaluated Plaintiff's fibromyalgia by relying on objective medical evidence and conservative treatment to discount her subjective symptom allegations without adequately explaining how that evidence undermined symptoms that are characteristic of a condition known to wax and wane and that cannot ordinarily be established through objective testing.
2. An RFC assessment must consider all of the claimant's physical and mental impairments and evaluate how they affect the claimant's ability to perform work-related functions on a regular and continuing basis, with a narrative explanation supported by the evidence.

KEY QUOTATIONS

“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.” (Analysis, § IV.A.i)

“Pursuant to sentence four of 42 U.S.C. § 405(g), the SSA’s judgment is REVERSED due to improperly discrediting Plaintiff’s fibromyalgia in contravention of Arakas, and the decision of the SSA is REMANDED for further proceedings in accordance with this Letter Order and Opinion.” (Conclusion)

FACTUAL BACKGROUND

Plaintiff alleged disability based on multiple severe impairments, including fibromyalgia, degenerative disc disease, diabetes with peripheral neuropathy, obesity, mental-health conditions, carpal tunnel syndrome, migraines, and thyroid disorder. The ALJ found that Plaintiff retained the capacity for a restricted range of sedentary work, had no past relevant work, and could perform several jobs existing in significant numbers in the national economy. In evaluating the fibromyalgia evidence, the ALJ relied in part on an asserted lack of objective physiological abnormalities, conservative treatment, and examinations showing normal strength, sensation, reflexes, and gait at times.

PROCEDURAL HISTORY

Plaintiff applied for disability insurance benefits and supplemental security income, alleging disability beginning November 9, 2018. An administrative law judge determined that Plaintiff was not disabled, and the Appeals Council affirmed on November 6, 2020. Plaintiff petitioned the District of Maryland for review on March 11, 2025. The court reversed the SSA's decision and remanded for further proceedings because the RFC analysis improperly evaluated Plaintiff's fibromyalgia symptoms.

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remand to the Social Security Administration for further proceedings consistent with the Letter Order and Opinion, including reconsideration of Plaintiff's fibromyalgia symptoms and the RFC determination. The court did not direct a finding that Plaintiff is disabled.

CASES CITED

- Mastro v. Apfel, 270 F.3d 171, 176 (4th Cir. 2001)
- Craig v. Chater, 76 F.3d 585, 589, 595 (4th Cir. 1996)
- Mascio v. Colvin, 780 F.3d 632, 634-36 (4th Cir. 2015)
- Lewis v. Berryhill, 858 F.3d 858, 862, 866, 868 n.3 (4th Cir. 2017)
- Hancock v. Astrue, 667 F.3d 470, 472 (4th Cir. 2012)
- Johnson v. Barnhart, 434 F.3d 650, 653 (4th Cir. 2005)
- Rodney M. v. Kijakazi, No. CV 23-0947-CDA, 2024 WL 1097192, at *3 (D. Md. Mar. 13, 2024)
- Thomas v. Berryhill, 916 F.3d 307, 311 (4th Cir. 2019)
- Monroe v. Colvin, 826 F.3d 176, 188-89 (4th Cir. 2016)
- Dowling v. Commissioner of Social Security Administration, 986 F.3d 377, 387-88 (4th Cir. 2021)
- Radford v. Colvin, 734 F.3d 288, 295 (4th Cir. 2013)
- Woods v. Berryhill, 888 F.3d 686, 694 (4th Cir. 2018)
- Arakas v. Commissioner, Social Security Administration, 983 F.3d 83, 97, 101-02 (4th Cir. 2020)
- Shelley C. v. Commissioner of Social Security Administration, 61 F.4th 341, 361-62 (4th Cir. 2023)
- Hardin v. Dudek, No. 7:24-cv-377-KS, 2025 WL 602951, at *5 (E.D.N.C. Feb. 25, 2025)
- Clifford v. O'Malley, No. 1:23-cv-704-LPA, 2024 WL 3105669, at *10 (M.D.N.C. June 24, 2024)
- Hines v. Barnhart, 453 F.3d 559, 563, 565-66 (4th Cir. 2006)
- Lapeirre-Gutt v. Astrue, 382 F. App'x 662, 664 (9th Cir. 2010)
- Hultz v. Bisignano, No. 23-2259, slip op. at 2, 17-22 (4th Cir. Dec. 15, 2025)