

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF MARYLAND

George K. v. Frank Bisignano

Civil No. 1:25-cv-01736-JMC (D. Md. Mar. 18, 2026) · No. Civil No. 1:25-cv-01736-JMC · Decided March 18, 2026

SUMMARY

The United States District Court for the District of Maryland remanded a Social Security Administration decision denying George Karle III’s claims for disability insurance benefits and supplemental security income. The court held that the ALJ failed to adequately consider and explain the effects of the plaintiff’s mental impairments, including PTSD, anxiety, and depression, in assessing his residual functional capacity. The judgment was reversed and remanded 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	J. Mark Coulson
JURISDICTION	United States District Court for the District of Maryland
DECIDED	March 18, 2026
DOCKET	Civil No. 1:25-cv-01736-JMC
DISPOSITION	reversed_and_remanded
PROCEDURAL POSTURE	Plaintiff sought judicial review under 42 U.S.C. § 405(g) of the Social Security Administration's final decision denying disability insurance benefits and supplemental security income. The court reviewed the parties' dispositive filings without a hearing and remanded for further administrative proceedings.
STANDARD OF REVIEW	The court reviews whether the ALJ's decision is supported by substantial evidence and reached through application of the correct legal standards. The court may not reweigh conflicting evidence, make credibility determinations, or substitute its judgment for that of the ALJ.
PRECEDENTIAL VALUE	unknown
PARTIES	George Karle, III v. Frank Bisignano, Social Security Administration

TOPICS

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PRACTICE AREAS

Social Security disability

administrative law

federal judicial review

QUESTIONS PRESENTED

1. Whether the ALJ adequately considered Plaintiff's mental impairments, including non-severe impairments, when determining his residual functional capacity.
2. Whether the ALJ's RFC assessment was supported by substantial evidence and adequately explained in light of conflicts in the record.
3. Whether the court needed to decide whether the ALJ correctly classified Plaintiff's mental impairments as non-severe at step two.

HOLDINGS

1. An ALJ must consider all medically determinable impairments, including impairments found non-severe at step two, when assessing a claimant's RFC, and must identify the functional limitations resulting from those impairments.
2. An RFC assessment must be accompanied by a narrative discussion identifying the supporting evidence and logically connecting that evidence to the RFC conclusion; unexplained evidentiary conflicts that frustrate meaningful review require remand.
3. The court need not decide whether the ALJ correctly found Plaintiff's mental impairments non-severe because the RFC assessment independently required remand.

KEY QUOTATIONS

"An RFC assessment is 'more detailed' than a special-technique analysis—to determine RFC, the ALJ must 'itemiz[e]' any functional deficits resulting from the limitations identified during the special-technique analysis." (Opinion Analysis, Section IV)

"The ALJ 'must both identify evidence that supports her conclusion and build an accurate and logical bridge from [that] evidence to her conclusion.'" (Opinion Analysis, Section IV)

"The record as a whole demonstrates too many conflicts that tend to support Plaintiff's mental health claims without an adequate explanation in the RFC assessment." (Opinion Analysis, Section IV)

FACTUAL BACKGROUND

Plaintiff applied for DIB and SSI based on alleged disability and had severe physical impairments including diabetes mellitus, a peripheral circulatory disorder, a foot callous, lesser-toe amputation, and a flat left foot with a pulled tendon. The ALJ found PTSD and anxiety disorder non-severe and did not address Plaintiff's later-diagnosed major depressive disorder in the step-two analysis. The record also contained Plaintiff's reports of functional and social limitations, treatment-provider evidence, and portions of a consultative examination suggesting that his social interaction and adaptation could be affected by emotional disturbance.

PROCEDURAL HISTORY

Plaintiff filed applications for DIB and SSI on August 30, 2022, alleging disability beginning October 16, 2020. The SSA denied the applications initially and on reconsideration. After a May 21, 2024 telephonic hearing, the ALJ denied benefits; the Appeals Council denied review on April 8, 2025, making the ALJ's decision final. Plaintiff filed this action on June 2, 2025. The district court reversed and remanded under sentence four of 42 U.S.C. § 405(g).

DISPOSITION

reversed_and_remanded

REMAND INSTRUCTIONS

Remand for further proceedings, including a proper assessment and explanation of Plaintiff's RFC that considers all medically determinable mental impairments, including those found non-severe, and addresses the conflicting evidence in the record. The court did not direct a particular disability finding.

CASES CITED

- Mastro v. Apfel, 270 F.3d 171, 176 (4th Cir. 2001)
- Craig v. Chater, 76 F.3d 585, 589 (4th Cir. 1996)
- Mascio v. Colvin, 780 F.3d 632, 634-36 (4th Cir. 2015)
- Lewis v. Berryhill, 858 F.3d 858, 862 (4th Cir. 2017)
- Bereniced W. v. O'Malley, Civil No. 23-1856-CDA, 2024 WL 3925082, at *2 (D. Md. Aug. 23, 2024)
- Felix S. v. Comm'r of Soc. Sec., 630 F. Supp. 3d 423, 430 (W.D.N.Y. 2022)
- Evans v. Heckler, 734 F.2d 1012, 1014 (4th Cir. 1984)
- Hoyle v. Comm'r of Soc. Sec., 1:20-cv-00273-RJC, 2022 WL 680220, at *3-4 (W.D.N.C. Mar. 7, 2022)
- 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. Comm'r of Soc. Sec. Admin., 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)

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