

UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF
PENNSYLVANIA

Brenda L. Edwards v. Frank Bisignano, Acting Commissioner of
Social Security

No. 3:24-CV-00244-CBB (W.D. Pa. Dec. 18, 2025) · No. 3:24-CV-00244-CBB · Decided December 18, 2025

SUMMARY

The United States District Court for the Western District of Pennsylvania reviews Brenda L. Edwards’s appeal from the denial of Widow’s Insurance Benefits under the Social Security Act. The court grants Edwards’s motion for summary judgment, denies the Commissioner’s cross-motion, vacates the benefits denial, and remands under sentence four of 42 U.S.C. § 405(g). The remand is based on the ALJ’s failure to sufficiently develop and explain the record concerning Edwards’s seizure history, brain surgeries, lobotomy, and potential cognitive effects.

CASE DETAILS

COURT	United States District Court for the Western District of Pennsylvania
WRITING FOR THE COURT	Christopher B. Brown
JURISDICTION	United States District Court for the Western District of Pennsylvania, Johnstown Division
DECIDED	December 18, 2025
DOCKET	3:24-CV-00244-CBB
DISPOSITION	vacated
PROCEDURAL POSTURE	Judicial review of the Commissioner's denial of Widow's Insurance Benefits on cross-motions for summary judgment under 42 U.S.C. § 405(g).
STANDARD OF REVIEW	The court reviews whether the Commissioner applied the correct legal standards and whether the record as a whole contains substantial evidence supporting the Commissioner's factual findings. The court must uphold a decision supported by substantial evidence and may not set it aside merely because it would have reached a different factual conclusion.
PRECEDENTIAL VALUE	unpublished

PARTIES

Brenda L. Edwards v. Frank Bisignano, Acting Commissioner of Social Security

TOPICS

judicial review of agency action

administrative law

summary judgment

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PRACTICE AREAS

social security

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QUESTIONS PRESENTED

1. Whether the ALJ adequately evaluated the supportability and consistency of the July 2023 mental residual functional capacity opinion of physician's assistant Shelbie Wood.
2. Whether the ALJ failed to develop the record and adequately explain the treatment of Edwards's seizure history, lobotomy, other brain surgeries, and possible resulting memory and concentration impairments.

HOLDINGS

1. The ALJ adequately evaluated the supportability and consistency of PA Wood's opinion under the revised Social Security regulations, and the rejection of that opinion was supported by substantial evidence.
2. The ALJ failed to develop the record and failed to adequately explain how Edwards's history of seizures, lobotomy, and other brain surgeries affected—or did not affect—her memory and concentration. The administrative decision therefore could not be meaningfully reviewed and had to be vacated and remanded.

KEY QUOTATIONS

“The Court agrees with Edwards that the ALJ should have further developed the record.” (Discussion § V.b.)

“With nothing in the record to resolve this inconsistency, there remains a significant gap in the record to support a disability determination here.” (Discussion § V.b.)

“More discussion of Edwards’ seizure disorder and its potential impacts, if any, is needed, because right now the ALJ has not provided enough explanation of his reasoning to enable the Court to conduct a meaningful review.” (Discussion § V.b.)

FACTUAL BACKGROUND

Edwards alleged disability beginning December 30, 2019 based on bipolar disorder, epilepsy, and migraines. She had a history of poorly controlled seizures, multiple brain surgeries including a lobotomy, and testified that memory and concentration problems contributed to her termination from a phlebotomy job. Although her seizures were reportedly controlled with medication at the time of the administrative proceedings, the record contained evidence suggesting possible long-term cognitive effects from her seizure history and brain surgeries.

PROCEDURAL HISTORY

Edwards applied for Widow's Insurance Benefits, and the application was denied initially and on reconsideration. After an administrative hearing, the ALJ denied benefits on November 24, 2023, and the Appeals Council declined review on August 23, 2024. Edwards filed a timely action in the Western District of Pennsylvania, where the parties filed cross-motions for summary judgment. The court granted Edwards's motion, denied the Commissioner's motion, vacated the administrative decision, and remanded under sentence four of § 405(g).

DISPOSITION

vacated

REMAND INSTRUCTIONS

Remand under sentence four of 42 U.S.C. § 405(g) for further development of the record concerning Edwards's seizure history, lobotomy, other brain surgeries, and possible long-term effects on memory, concentration, and ability to sustain attention, including consideration of whether a consultative examination is appropriate. The ALJ must also explain the treatment of the pertinent evidence sufficiently to permit meaningful judicial review.

CASES CITED

- Rutherford v. Barnhart, 399 F.3d 546, 552 (3d Cir. 2005)
- Hartranft v. Apfel, 181 F.3d 358, 360 (3d Cir. 1999)
- Plummer v. Apfel, 186 F.3d 422, 427, 434 (3d Cir. 1999)
- Biestek v. Berryhill, 139 S. Ct. 1148, 1154 (2019)
- Cotter v. Harris, 642 F.2d 700, 704-06 (3d Cir. 1981)
- King v. Califano, 615 F.2d 1018 (4th Cir. 1980)
- Brewster v. Heckler, 786 F.2d 581, 583 (3d Cir. 1986)
- Barnhart v. Thomas, 540 U.S. 20, 24-25 (2003)
- Doak v. Heckler, 790 F.2d 26, 28 (3d Cir. 1986)
- Chung v. Comm'r Soc. Sec., No. 24-1974, 2025 WL 1065241, at *3 (3d Cir. Apr. 9, 2025)
- Zaborowski v. Comm'r of Soc. Sec., 115 F.4th 637, 639 (3d Cir. 2024)
- Hemenway v. O'Malley, No. 22-345, 2024 WL 1013978, at *1 n.2 (W.D. Pa. Mar. 8, 2024)
- Tedesco v. Comm'r Soc. Sec., 833 F. App'x 957, 961 (3d Cir. 2020)
- Stark v. Dudek, No. 2:24-CV-1464, 2025 WL 1736485, at *4 n.2 (W.D. Pa. June 23, 2025)
- Cota v. Kijakazi, No. 21-cv-672, 2022 WL 3686593, at *5 (M.D. Pa. Aug. 25, 2022)
- Gongon v. Kijakazi, 676 F. Supp. 3d 383, No. 22-cv-384, 2023 WL 3919467, at *11 (E.D. Pa. 2023)
- Maneer v. Comm'r of Soc. Sec., No. 23-548, 2024 WL 3377909, at *1 n.1 (W.D. Pa. July 11, 2024)
- Dimter v. Comm'r Soc. Sec., No. 24-1350, 2024 WL 4986935, at *3 (3d Cir. Dec. 5, 2024)
- Scott v. Kijakazi, No. CV 20-1793, 2022 WL 2441059, at *1 n.2 (W.D. Pa. July 5, 2022)

- Thompson v. Halter, 45 F. App'x 146, 149 (3d Cir. 2002)
- Brown v. Saul, 2020 WL 6731732, at *4 (M.D. Pa. Oct. 23, 2020), report and recommendation adopted, 2020 WL 6729164 (M.D. Pa. Nov. 16, 2020)
- Miller v. Saul, No. 3:17-CV-01452, 2019 WL 3776662, at *7 (M.D. Pa. Apr. 22, 2019)
- Stripling v. Comm'r of Soc. Sec., No. 4:22-CV-00843, 2024 WL 6901310, at *4 (W.D. Mo. Mar. 25, 2024)
- Gable v. Kijakazi, No. 1:21-CV-00194, 2022 WL 3084305, at *9 (M.D. Pa. Aug. 3, 2022)
- O'Neill v. Bisignano, No. 4:24-CV-2156, 2025 WL 3469271, at *10 (M.D. Pa. Dec. 3, 2025)

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